

## Privacy Policy

Stella & Dot LLC (d/b/a Stella & Dot Family Brands, KEEP Collective, and EVER LLC) and its wholly-owned U.S. subsidiary, Stella & Dot Jewelry LLC (collectively, “Stella & Dot”, “we”, “us”, or “our”) want your experience with us to be nothing short of fabulous. We respect the privacy of our Stella & Dot Family Brands Independent Business Owners, customers and those who use our services. To this end, we have systems in place for securely managing your Personal Information. We created this Privacy Policy to help you understand the types of information we collect, how we use and disclose it, your options related to it, and our responsibilities in safeguarding it.

This Privacy Policy is incorporated into our Terms of Use. All capitalized terms not defined in this Privacy Policy have the meaning set forth in the Terms of Use.

**This Privacy Policy applies to the Service, and it also applies to collection of your Personal Information from offline sources as described in this Privacy Policy.**

“**Personal Information**” means information that alone or when in combination with other information may be used to readily identify, contact, or locate you, such as: name, address, email address, or phone number.

### COLLECTION OF INFORMATION

We collect Personal Information when you:

- register to use the Service, place an order, or provide contact information to an Independent Business Owner;
- register as an Independent Business Owner or express interest in becoming an Independent Business Owner;
- use the Service; and
- communicate with us.

We also collect information, such as anonymous usage statistics, by using cookies, server logs, and other similar technology as you use the Service.

You do not need to provide Personal Information to visit the Service. All Personal Information gathered is on a voluntary basis. If you decide to provide us with your Personal Information, we may store it through whatever means you provided such information (through our Service, Independent Business Owner, via email or facsimile, etc.). By using the Service, submitting a signed Customer Order Form to an Independent Business Owner, or submitting a new Independent Business Owner Agreement to us, you also authorize us to gather, parse, retain, use,

and disclose information to provide the Service and our services as described in this Privacy Policy, unless we are notified otherwise.

**Customer Online Registration.** To register as a customer on our Website, you may need to provide Personal Information, such as your name, email address, and password. You may also provide other optional information, such as your month and day of birth.

**Customer Information from Independent Business Owners.** Customers may complete and sign a Customer Order Form at a Sales Event (Trunk Show, Design Session or Social) and provide it to an Independent Business Owner. The Independent Business Owner will submit the information to us through the Service so that we may process your order. Customers may also provide their contact information to Independent Business Owners without making a purchase, and Independent Business Owners may save such information in their contact lists on the Service. All Independent Business Owners must abide by this Privacy Policy and must not share information except in connection with their Stella & Dot Family Brands business.

**Independent Business Owner Registration.** To register as an Independent Business Owner on our Service, you may need to provide Personal Information, such as your name, social security number, tax identification number, date of birth, email address, telephone number, postal address, and password. You may also provide other information, such as your photograph and information in your completed and digitally signed online Independent Business Owner Agreement. Upon the termination of the relationship between Stella & Dot and the Independent Business Owner, Stella & Dot will keep the Independent Business Owner's Personal Information for lawful purposes only.

**Expressing Interest in Becoming an Independent Business Owner.** We collect any Personal Information included in requests to learn more about being an Independent Business Owner or Hostess. Such information may be submitted to us through the Service or via email. You may also provide Personal Information directly to a Stella & Dot Family Brands Independent Business Owner.

**Using the Service.** We collect information you post through the Service. For example, when customers sign up for a newsletter, post a photograph, or connect with an Independent Business Owner, the Service will collect the information customers or Independent Business Owners provide in such submissions, including any Personal Information.

**Making Payments.** When you make payments through the Service or complete a Customer Order Form, your financial account information, such as your credit card number, will be collected by our third-party payment processors. We do not collect or store such financial account information, but we may receive information from our payment processor about the payment, such as the date and time of payment.

**Social Plug-Ins.** The Website may allow you to use social media plug-ins, such as Facebook's "like" or Twitter's "tweet" functions. The social media plug-ins collect information about you, such as your IP address, when you use them. The privacy policies of the social media services, and not this Privacy Policy, apply to any data collected by the social media plug-ins.

**Social Media Pages.** We may collect information about you when you visit our social media pages or other features. The social media website provider may provide us with information, including Personal Information, such as your name, email address, and other information made available to us.

**Customer Support.** We may collect Personal Information through your communications with our customer-support team.

### **Cookies and Similar Technology.**

We and our third party service providers, such as advertising networks and analytics service providers, may collect anonymous information automatically through the use of “cookies” and similar technology. The service providers also may collect information about your online activities over time and on other websites or apps. Cookies are small pieces of information that are stored by your browser on your computer’s hard drive to collect information about your activities on our Website.

We use cookies to collect and store information for statistical purposes, including browsing and Service usage activity, and to improve the services we provide. For example, if you are a registered user, we will use a cookie to save your Service settings and to provide customizable and personalized services. Cookies also enable you to select products, place them in your shopping cart and purchase the items. If you select and purchase products on the Service, we keep a record of your browsing activity and purchases. Most browsers allow you to refuse cookies from websites or to remove cookies from your hard drive. If you choose to do this, you may not be able to access or use portions of the Website.

### **INFORMATION USE**

We use Personal Information to:

- facilitate and improve the Service and our services;
- communicate with you; and
- promote Independent Business Owners.

We may use de-identified and aggregate information for any purpose, including for marketing purposes.

**Internal and Service-Related Usage.** Stella & Dot will use information, including Personal Information, for internal, administrative, and service-related purposes. We may use and retain any data we collect to provide and improve our services. For example, we use Personal Information submitted by customers to process and complete the customer’s order, including for shipping and billing purposes. We also use Personal Information submitted by Independent Business Owners to calculate and process commissions.

**Communications.** We use a customer's name, mailing address, email address and telephone number for the following limited purposes:

- Sending emails for informational and operational purposes, such as account management or system maintenance;
- Monitoring and ensuring customer satisfaction, including troubleshooting problems and resolving disputes;
- Keeping you informed of new products and promotions at Stella & Dot Family Brands; and
- Sending you Stella & Dot Family Brands newsletters.

**Promoting Independent Business Owners.** Stella & Dot may, from time to time, publish an Independent Business Owner's Personal Information (for example, name, photograph, sales results and achievements) to recognize the Independent Business Owner's achievements and help motivate other Independent Business Owners. These promotions will not contain Personal Information about customers.

**Aggregate Data.** We may anonymize and aggregate data collected through the Service and use it for any purpose. For example, we may aggregate usage and transaction information to provide product recommendations to Website users.

## INFORMATION DISCLOSURES

We may share your information:

- with our third-party vendors and service providers;
- to refer you to an Independent Business Owner;
- to connect Independent Business Owners with other Independent Business Owners;
- to comply with legal obligations;
- to protect and defend our rights and property; and
- with your permission.

We do not rent, sell, or share Personal Information about you with other people or nonaffiliated companies for their direct marketing purposes, unless we have your permission. We may share anonymous information for marketing and advertising purposes.

**Vendors and Service Providers.** We want to provide you with excellent service and make your Stella & Dot Family Brands experience as seamless as possible. We share information,

including nonpublic Personal Information, with third parties that perform services on our behalf so we can provide and improve our services. For example, we may disclose Personal Information for fraud detection and prevention. These third parties must abide by this Privacy Policy and keep nonpublic information confidential and use it only for its intended purpose.

**Connect Independent Business Owners.** To facilitate communications among our network of Independent Business Owners, we may share Independent Business Owners' or prospective Independent Business Owners' contact information with other Independent Business Owners.

**Referrals.** As part of our service and to make sure customer needs are met, we may refer customers to an Independent Business Owner, such as when customers are not associated with an Independent Business Owner in our systems or when customers request to host a Trunk Show. We may share customer contact information with Independent Business Owners for these purposes.

**Marketing.** We do not rent, sell, or share Personal Information about you with other people or nonaffiliated companies for their direct marketing purposes, unless we have your permission. We may allow access to other data collected by the Service to enable the delivery of online advertising on the Service, or otherwise facilitate transmittal of information we think may be useful or relevant to you.

We may also share data collected by the Service, including email addresses, to show you and others personalized advertisements on other websites and online services and to send you marketing emails from us after you visit the Services or our social media pages and websites.

You may be able to opt out of receiving personalized advertisements from advertisers or advertising networks who are members of the Network Advertising Initiative or who subscribe to the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising by visiting the opt-out sections on the websites of each of those organizations. Links to those sites are here:

Network Advertising Initiative: <http://www.networkadvertising.org/choices/>

Digital Advertising Alliance: <http://www.aboutads.info/choices/>

When you opt out of personalized advertising, you may continue to see online advertising from Stella & Dot Family Brands on other websites.

**As Required By Law and Similar Disclosures.** We may access, preserve, and disclose collected information, if we believe doing so is required or appropriate to: comply with law enforcement requests and legal process, such as lawful requests by public authorities, including to meet national security or law enforcement requirements, and such as a court order or subpoena; respond to your requests; or protect your, our, or others' rights, property, or safety.

**Corporate Changes.** We reserve the right to transfer Personal Information in the event Stella & Dot acquires or merges with or is acquired by another company or during other corporate

changes. Any information disclosed as a result of one of these events or other corporate changes will be subject to the Privacy Policy in effect at the time.

**Your Permission.** We may also disclose your Personal Information with your permission.

## **CHILDREN’S PRIVACY**

We respect children’s privacy. We do not knowingly or intentionally collect or maintain Personal Information from children under age 13, and no part of the Service is directed to children under the age of 13. **IF YOU ARE UNDER THE AGE OF 13, PLEASE DO NOT SUBMIT ANY PERSONAL INFORMATION TO US.** You should rely on a parent or guardian to assist you. If you learn that your child has provided us with Personal Information without your consent, you may alert us at [privacy@stelladot.com](mailto:privacy@stelladot.com). If we learn that we have collected any Personal Information from children under 13, we will promptly take steps to delete such information and terminate the child’s account.

## **INTERNATIONAL DATA TRANSFERS**

Stella & Dot is a global organization, with legal entities, business processes, and technical systems that operate across borders. Stella & Dot may transfer your Personal Information to other Stella & Dot entities in the United States and elsewhere. The United States and other countries may not have the same data protection laws as in the country from which you initially provided the information. By accessing Stella & Dot websites, registering for an account, or otherwise providing Stella & Dot with your Personal Information, you consent to this transfer of your Personal Information. When transferring your Personal Information internationally, Stella & Dot will protect your Personal Information as provided in this Privacy Policy.

If you are located in the European Economic Area (“EEA”), Stella & Dot and its controlled United States subsidiaries have certified to the EU-U.S. Privacy Shield Framework for the transfer of Personal Information from the EEA to the United States. To learn more about the EU-U.S. Privacy Shield Framework and to view our certification, please visit [www.privacyshield.gov](http://www.privacyshield.gov).

## **INFORMATION SECURITY**

We take reasonable and appropriate steps, taking into account the risks involved in the processing and the nature of the Personal Information, to help protect your Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction and that it is treated in accordance with this Privacy Policy. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us.

Please note that email is not encrypted and is not considered a secure means of transmitting credit card numbers or other sensitive information. Stella & Dot will NEVER ask for sensitive information via email.

By using the Service or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Service. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Service or sending an email to you. You may have a legal right to receive this notice in writing. To receive free written notice of a security breach (or to withdraw your consent from receiving electronic notice), please notify us at [privacy@stelladot.com](mailto:privacy@stelladot.com).

## **YOUR RIGHTS AND CHOICES**

Where appropriate, you may review, correct, add to or delete your Personal Information through the Service if your Personal Information is inaccurate or has been processed in violation of the Principles (defined below). If you have registered with us, you will be able to view and modify information contained in your personal profile. However, for security purposes, you must contact Stella & Dot directly to change your tax identification number or social security number. You may also contact us to remove any Personal Information from our database.

Stella & Dot acknowledges that EU individuals have the right to access the personal information that we maintain about them. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data, should direct his query to [privacy@stelladot.com](mailto:privacy@stelladot.com). If requested to remove data, we will respond within a reasonable timeframe.

## **EU-U.S. PRIVACY SHIELD**

Stella & Dot complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. Stella & Dot has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

Any Personal Information we receive may be used by Stella & Dot for the purposes indicated in this Privacy Policy or as otherwise notified to you. We will not process Personal Information in a way that is incompatible with these purposes unless subsequently authorized by you.

In the event Personal Information is (i) to be used for a purpose that is materially different from the purposes for which the Personal Information was originally collected or subsequently authorized, or (ii) transferred to a third party acting as a data controller, you will be given, where practical and appropriate, an opportunity to opt out of having your Personal Information so used or transferred where it involves non-sensitive information. Where such use or transfer involves sensitive information, you must opt-in before we may make such use or transfer of your Personal Information.

We remain liable for the processing of Personal Information received under the Privacy Shield and subsequently transferred to a third party acting on our behalf and under our instructions if this entity processes such Personal Information in a manner inconsistent with the Principles, unless we prove that we are not responsible for the event giving rise to the damage.

We have procedures in place to periodically verify implementation and compliance with the Principles. Stella & Dot conducts an annual self-assessment of our Personal Information practices to verify that assertions made in this privacy policy are true and have been implemented as represented.

In compliance with the EU-US Privacy Shield Principles, Stella & Dot commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should contact Stella & Dot LLC at [privacy@stelladot.com](mailto:privacy@stelladot.com) or by mail, Attn: Privacy Administrator, 8000 Marina Boulevard, Suite 400, Brisbane, CA 94005.

Stella & Dot has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbb.org/EU-privacy-shield/for-eu-consumers/](http://www.bbb.org/EU-privacy-shield/for-eu-consumers/) for more information and to file a complaint.

For residual complaints not fully or partially resolved by other means, you may be able to invoke binding arbitration as detailed in the Principles available [here](#).

Stella & Dot is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

## **COMPLIANCE WITH CANADA’S ANTI-SPAM LEGISLATION (“CASL”)**

You may be asked to provide your Personal Information to opt-in to receive emails about Stella & Dot’s Family Brands’ products, promotions, special offers and company updates. This consent is sought by Stella & Dot LLC, 8000 Marina Boulevard, Suite 400, Brisbane, CA 94005. You can unsubscribe at any time from these commercial electronic messages by using the “unsubscribe link” located in the email, or by contacting us at [privacy@stelladot.com](mailto:privacy@stelladot.com) or by mail, Attn: Privacy Administrator, 8000 Marina Boulevard, Suite 400, Brisbane, CA 94005.

## **CHANGES TO PRIVACY POLICY AND QUESTIONS**

This Policy may be amended, from time to time. If Stella & Dot decides to change its Privacy Policy, we will post those changes and revise the “Last Updated” date at the bottom on the Privacy Policy.

If you have questions about this Policy, please contact us at [privacy@stelladot.com](mailto:privacy@stelladot.com) or by mail, Attn: Privacy Administrator, 8000 Marina Boulevard, Suite 400, Brisbane, CA 94005

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