

Privacy Policy

Last Modified: July 1, 2018

Applicability

This Privacy Policy applies to you if you are visiting or using any features of the Website (as defined below) from within the United States of America or its territories.

This Privacy Policy is hereby made a part of the Terms & Conditions (Regulations of the Internet Shop).

Introduction

Zepter International USA Inc. (the “**Company**”, “**us**” or “**we**”) respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website shopzepterusa.com (the “**Website**”), when you send information to us through the Website, and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On the Website.
- In email, text, and other electronic messages between you and the Website.
- Through mobile and desktop applications, if any, that you download from the Website.
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.
- Through any other means associated with or relating to the Website.

This policy does not apply to information collected by:

- us offline or through any other means, including on any other website operated by the Company or any third party (including our affiliates and subsidiaries); or
- any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to the terms of this privacy policy.

This policy may change from time to time. Your continued use of the Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children Under the Age of 18

Our Website is not intended for children under eighteen (18) years of age. No one under age eighteen (18) may provide any personal information to us or on or through the Website.

Types of Information We Collect About You and How We Collect It

We may collect several types of information from and about users of our Website, including information:

- by which you may be personally identified, such as name, mailing address, e-mail address, or telephone numbers (collectively, “**personal information**”) when you make a purchase or register for an account on our Website;
- that is about you but individually does not identify you, such as the geographic location from which you accessed the Website; and
- about your internet connection, the equipment you use to access our Website, your browsing history, and usage details.

We collect this information:

- Directly from you when you provide it to us;
- Automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, our business partners and affiliates.

Information We Collect About You. The information we collect on or about you may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website or signing up to become a member of the Company’s Club Live 100™ program, subscribing to any other service we provide, submitting an application for employment with us, or requesting further services or information from us.
- Information you provide to us or we acquire from your network or computing device when you report a problem with our Website and as we troubleshoot and work on the problem you reported.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Any comments and information you provide to us when you use the “Contact Us” feature of our Website, if such a feature is available.
- Your responses to surveys that we might ask you to complete.
- Details of transactions you carry out on or through our Website, including any purchases and your purchase history, if any.
- Your search queries on the Website.
- Information that our business partners collect about you, such as services you have signed up to receive, or products you have purchased, in each case which are related to our business.
- Information you provide when you contact our customer service agents, if available.
- Any other information you provide to us, or we collect throughout your usage of or access to our Website, which we collect for a business purpose.

Information We Collect Through Automatic Data Collection Technologies.

As you navigate through and interact with our Website and mobile applications (if available), we may use automatic data collection technologies to collect certain information about you, your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer or mobile device and about your internet connection, including your IP address, mobile device identifier, your operating system, browser type, and the name of your mobile carrier.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

The information we collect automatically is statistical data and may also include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our services and our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.
- Analyze our services and products and perform market research.

When you visit or leave our Website by clicking a hyperlink or when you view a third-party site that includes our plugins or cookies (or similar technology), we may automatically receive the URL of the site from which you came or the one to which you are directed.

We may also receive location data passed to us from third-party services or GPS-enabled devices that you have set up, which we may use to show you local information on our mobile applications and for fraud prevention and security purposes. Most mobile devices allow you to prevent real time location data being sent to us, and of course we will honor your settings.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. Note that while you can set your browser to not allow cookies, we may not be able to honor that request, and may track your activity and collect information about you and your online activities even when the browser is set to “do not track”.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies and you may not be able to shut down our collection of and use of information through this technology.
- **Web Beacons.** Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Google Analytics

We use Google Analytics, a service provided by Google, Inc. (“**Google**”) to analyze traffic on our

Website. Google utilizes the data collected to track and examine the use of our Website, and to prepare reports for us based on your activities online, among other uses. As part of Google Analytics, Google tracks many variables, including what website you visited prior to coming to our Website, how long you stay on a particular page, and your geographic location.

Do Not Track

Do Not Track (“DNT”) is a concept promoted by certain regulatory authorities and industry groups for development and implementation of a mechanism that would allow internet users to control the tracking of their online activities across websites. Currently, various browsers (including Internet Explorer, Firefox, and Safari) offer a DNT option that allows a user to set a preference in the browser to not have his/her activities on the internet tracked. You can usually access your browser's DNT option in your browser's preferences. When a user's browser is set to DNT, some cookies and other tracking technologies may become inactive, depending on how the website visited responds to DNT browser settings. If that occurs, the website visited will not recognize you upon return to that website, save your passwords or user names, and some other features of a website may become unavailable or not function properly. However, at this time, given a lack of standards in the industry, our Website does not respond to DNT settings, and your information may be collected and processed even though you have activated DNT in your browser.

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website may be served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

How We Use Your Information

We may use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account and/or the Website.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection, if needed.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website, if any.
- To develop and create our products and services.
- For behavioral tracking.
- For any other purpose as needed for our business.
- In any other way we may describe when you provide the information.

- For any other purpose with your consent.
- To contact you about our own and third-parties' goods and services that we think may be of interest to you.
- To enable us to display advertisements to our advertisers' target audiences.

If you have signed up to receive a newsletter from us, or if we send you marketing emails you wish to opt out of receiving, you can make use of the opt-out/unsubscribe links in the communications we send you.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that is not considered personally identifiable information pursuant to U.S. laws, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and assist us in providing services and offering our products.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets or stock, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about our Website users is among the assets transferred.
- To third parties to market their products or services to you.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including responding to any government or regulatory request.
- To enforce or apply any agreements between us, including this Privacy Policy, and any other agreements between us (such as any other online terms applicable to your use of our website), including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Your California Privacy Rights

California Civil Code Section 1798.83, known as the “Shine The Light” law, permits our customers who are California residents to request and obtain from us a list of what personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once a year and are free of charge.

Note that, as stated in the ‘Information We Collect Through Automatic Data Collection Technologies’ Section above, we may use cookies and other tracking technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

Please also see the “Do Not Track” Section above for information on how our Website responds to your browser’s “do not track” settings.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone and to change your password from time to time. We also highly recommend that you use a password that is dissimilar to and cannot be easily found by unauthorized third parties who may have obtained your login credentials to other sites. Keep in mind that if you use the same password for all websites, if someone obtains your credentials for one site, they may be able to then use those credentials to log into any other site you use.

Unfortunately, the transmission of information via the internet is not completely secure. Although we try to protect your personal information, we cannot guarantee the security of your personal information transmitted through or collected through the use of our Website. Any transmission of personal information is at your own risk.

We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at: service@zepter-usa.com.