

I. Drylendar Privacy Policy

Effective Date: 10/08/2023

Introduction

Welcome to **Drylendar** ! App Craft Studio operates **Drylendar** mobile application and integrations on partner products and services (hereinafter referred to as the “**Service**”).

Drylendar, App Craft Studio(“**Drylendar** ”, “**App Craft Studio**”, “**us**”, “**we**”, or “**our**”) are committed to protecting your privacy. Our Privacy Policy governs your use of the Service, and explains how we collect, safeguard and disclose information that results from your use of the Service. We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms of Use. Our Terms of Use (“**Terms**”) govern all use of the Service and should be read together with the Privacy Policy.

Table of Contents

It is important that you read and understand these entire Privacy Policy before using the Service. For ease of review, below is a table of contents that links to each section. Please note that the complete provisions and not the headings shall govern. You can click on the headings to be taken to the full explanation.

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| 1. Types of Personal Information We May Collect, Use, and Disclose | We collect, use, and disclose information that may be used to uniquely identify you in various ways in accordance with applicable law. |
| 2. Cookies and Tracking Technologies | We collect information about your use of the Service through cookies and other tracking technologies. |
| 3. Disclosure of Personal Information | We may share your personal information with certain third parties, including service providers and advertising partners. |
| 4. Data Retention | We will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy. |
| 5. Data Security | We use reasonable and appropriate technical and organizational measures to protect your personal information. |
| 6. Your U.S. State Privacy Rights | We provide additional disclosures and rights to residents of certain U.S. states. |
| 7. International Transfers of Your Personal Information | Your personal information may be transferred to the U.S. and other countries. |
| 8. California Privacy Notice | We provide additional disclosures and rights to California residents. |
| 9. Colorado Privacy Notice | We provide additional disclosures and rights to Colorado residents. |

10. Connecticut Privacy Notice	We provide additional disclosures and rights to Connecticut residents.
11. Nevada Privacy Notice	We provide additional disclosures and rights to Nevada residents.
12. Virginia Privacy Notice	We provide additional disclosures and rights to Virginia residents.
13. Utah Privacy Notice	We provide additional disclosures and rights to Utah residents.
14. European Privacy Notice	We provide additional disclosures and rights to residents of the European Economic Area, United Kingdom, and Switzerland.
15. Canadian Privacy Notice	We provide additional disclosures and rights to Canadian residents.
16. Children's Privacy	The Service is not intended for use by children under the age of 13 and we use reasonable age verification measures to limit access to the Service.
17. Changes to This Privacy Policy	Changes to this Privacy Policy will become effective on the date they are posted.
18. Contact Us	You may contact us for comments or questions in various ways.

1. Types of Personal Information We May Collect, Use, and Disclose

“**Personal information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an identifiable individual. Personal information includes “**personal data**” as that term is defined in applicable privacy laws, as may be further described in **Sections 8–15** of this Privacy Policy. Personal information does not include publicly available information; lawfully obtained, truthful information that is a matter of public concern; information that has been de-identified, or aggregate consumer information. For more information how we collect and use the information in the following table, please review Sections 8-15. We may disclose non-personal information, such as aggregated user statistics, to third parties. Our use of aggregated, anonymized, and de-identified data is not subject to this privacy policy.

Categories of Personal Information Collected	Examples	Processing Purposes Linked to Categories	Categories of Third Party Recipients (Excluding Services Providers and Affiliates)

<p><i>Identifiers</i></p>	<ul style="list-style-type: none"> • Name • Account username • Phone number • Certain social media account information including user ID, • IP address • Unique device identifiers • App identifiers • Device operating system information 	<ul style="list-style-type: none"> • To contact you and provide information • Customer service • For identity and age verification as required under applicable law • To provide and maintain the Service • To facilitate interactive features • For internal analytics • Marketing our products and services • Marketing the products and services of others • Promotions and sweepstakes • For internal business purposes, including general business administration • Audit, compliance, legal, policy, procedure, and regulatory obligations • Customer claims and fraud investigation and prevention 	<ul style="list-style-type: none"> • Third-party advertising marketing companies • Co-branded partners • Other individuals with your consent
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		<ul style="list-style-type: none"> • Systems and data security • Protecting the safety of our employees and others • Targeted Advertising • Profiling • For any purpose consistent with your preferences 	
<i>Commercial information</i>	<ul style="list-style-type: none"> • Information about your interests and preferences 	Same purposes as noted for “Identifiers”	Third-party advertising marketing companies
<i>Geolocation Data</i>	<ul style="list-style-type: none"> • Global Positioning System (“GPS”) data • Locational information based upon your IP address • Cell network data • Locational data collected from various devices including your mobile device(s) or vehicles(s) 	<ul style="list-style-type: none"> • For internal business purposes, including general business administration • Customer claims and fraud investigation and prevention • Systems and data security • Protecting the safety of our employees and others • Internal analytics 	N/A
<i>Audio, electronic, visual, or similar information</i>	<ul style="list-style-type: none"> • Any original text, audio recordings, photos, videos, music, and other media you may 	Same purposes as noted for “Identifiers”	Third-party advertising marketing companies

	share on the Service.		
<i>Characteristics or protected classifications</i>	<ul style="list-style-type: none"> Age Gender 	<ul style="list-style-type: none"> For internal business purposes, including general business administration Customer claims and fraud investigation and prevention Systems and data security Protecting the safety of our employees and others Internal analytics 	N/A
<i>Inferences about you using any of the above</i>	<ul style="list-style-type: none"> Information drawn from any of the information above categories of information 	For any of the purposes listed above	Third-party advertising marketing companies

Please note that because of the overlapping nature of certain of the categories of personal information identified above, which are required by state law, some of the personal information we collect may be reasonably classified under multiple categories.

2. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to track the activity on the Service and we hold certain information.

Cookies are files with a small amount of data which may include unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service. Examples of Cookies we use:

- Strictly Necessary.** We may use cookies that we consider are strictly necessary to allow you to use and access our website, including cookies required to prevent fraudulent activity, improve security or allow you to make use of shopping cart functionality.

- **Performance Related.** We may use cookies that are useful in order to assess the performance of our website, including as part of our analytic practices or otherwise to improve the content, products or services offered through our website.
- **Functionality Related.** We may use cookies that are required to offer you enhanced functionality when accessing our website, including identifying you when you sign in to our website or keeping track of your specified preferences, including in terms of the presentation of content on our website.
- **Targeting Related.** We may use cookies to deliver content, including ads, relevant to your interests on our website and third party sites based on how you interact with advertisements or content.

We may use third-party Service Providers to monitor and analyze the use of our Service. Amplitude is analytics service provided by Amplitude Analytics, Inc. Firebase is an analytics service provided by Google Inc. You may opt-out of certain Firebase features through your mobile device settings, such as your device advertising settings or by following the instructions provided by Google in their Privacy Policy.

We may use Google Analytics or other service providers for analytics services. These analytics services may use cookies and other tracking technologies to help us analyze how users use the Service. Information generated by these services (e.g., your IP address and other usage information) may be transmitted to and stored by Google Analytics and other service providers on servers in the U.S. (or elsewhere) and these service providers may use this information for purposes such as evaluating your use of the Service, compiling statistic reports on the Service's activity, and providing other services relating to Service activity and other Internet usage. You may exercise choices regarding the use of cookies from Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on. Additionally, we may use third-party Service Providers to monitor and analyze the use of our Service. Amplitude is analytics service provided by Amplitude Analytics, Inc. Firebase is analytics service provided by Google Inc. You may opt-out of certain Firebase features through your mobile device settings, such as your device advertising settings or by following the instructions provided by Google.

Third-Party Ad Networks. Certain companies may participate in the Digital Advertising Alliance ("DAA") AdChoices Program and may display an Advertising Option Icon for Interest-based Ads that links to an opt-out tool which allows you to exercise certain choices regarding targeting. You can learn more about the DAA AdChoices Program at <http://www.youradchoices.com/> and its opt-out program for mobile apps at <http://www.aboutads.info/appchoices>. In addition, certain advertising networks and exchanges may participate in the Network Advertising Initiative ("NAI"). NAI has developed a tool that allows consumers to opt out of certain Interest-based Ads delivered by NAI members' ad networks. To learn more about opting out of such targeted advertising or to use the NAI tool, see <http://www.networkadvertising.org/choices/>. Please be aware that, even if you are able to opt out of certain kinds of Interest-based Ads, you will continue to receive non-targeted ads. Further, opting out of one or more NAI or DAA members only means that those selected members should no longer under the DAA / NAI rules deliver certain targeted ads to you. This will affect this and other services, but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). Also, if your browsers are configured to reject cookies when you visit this opt-out page, or you subsequently erase your cookies, use a different device or web browser(s), or use a non-browser-based method of access (e.g., mobile app), your NAI / DAA

browser-based opt-out may not, or may no longer, be effective. Mobile device opt-outs will not affect browser-based Interest-based Ads even on the same device, and you must opt-out separately for each device. We are not responsible for the effectiveness of, or compliance with, any third-parties' opt-out options or programs or the accuracy of their statements regarding their programs.

3. Disclosure of Personal Information

We may disclose personal information that we collect, or you provide:

- **Among our brands and affiliates.** We may share personal information among our various brands and affiliates to provide our Services, and for internal administrative purposes.
- **Our service providers.** We share personal information with our service providers to provide services on our behalf, such as payment processing, analytics, advertising, hosting, marketing, customer and technical support, and other services. These third parties have access to your personal information only to perform these tasks on our behalf and are obligated not to disclose or use the information for any other purpose.
- **Third-party platform advertising.** We may share your information with third-party platform providers who assist us in serving advertising regarding the Services to others who may be interested. We also partner with third parties who use Cookies to serve interest-based advertising and content on their respective third-party platforms that may be based on your preferences, location and/or interests.
- **Compliance and harm prevention.** Under certain circumstances, we may be required to disclose your personal information if required to do so by law or in response to valid requests by public authorities.
- **Affiliate and business transfers and transactions.** If we or our subsidiaries are involved in a merger, acquisition, asset sale, or other corporate combination, your personal information may be transferred to the acquiring or surviving entity.

4. Data Retention

We will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. We will also retain certain personal information for internal analysis purposes. This information is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

Our determination of precise retention periods will be based on (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of our legal position, including regard to applicable statutes of limitations, litigation or regulatory investigations.

5. Data Security

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially

reasonable security procedures and practices appropriate to the nature of the personal information, we cannot guarantee its absolute security.

6. Your U.S. State Privacy Rights

You may have certain rights and choices regarding our collection, use, and disclosure of your personal information. These may vary based on your location or place of residency, but may include some or all of the rights described below. Please review Sections 8-16 of this Privacy Policy for additional information specific to the rights that may be available in your location.

- **Opting out of promotional electronic communications from us.** If you no longer wish to receive promotional email communications from us, you may opt out via the unsubscribe link included in such emails or communicate your opt-out request using the information below. We will comply with your request as soon as reasonably practicable. Please note that if you opt out of receiving promotional emails from us, we may still send you important administrative messages that are required in order to provide you with the Service or for other reasons disclosed in this Policy.
- **Additional rights available in certain states and jurisdictions.** Certain jurisdictions provide residents with certain rights with respect to their personal information or personal data as defined under applicable law, including residents of California, Colorado, Connecticut, Nevada, Virginia, and Utah, as well as those located in certain international jurisdictions. Please be advised that these rights are subject to the specific laws of that jurisdiction and that certain other rights might apply. Please review Sections 8-16 below for more information on rights and terms specific to your location or place of residence.
 - **Right to Know and Access.** You may have the right to know what personal information we collect, use, disclose, and/or sell or share as those terms are defined under applicable law. You may ask us to provide you a portable copy of this information up to two times in a rolling twelve-month period.
 - **Right to Delete and Erase.** You may have the right to request under certain circumstances that we, as well as our service providers and contractors, delete the personal information that we collect about you.
 - **Right to Correct Inaccurate Personal information.** You may have the right to request the correction of inaccurate personal information.
 - **Right to Opt-Out.** You may have the right to opt-out of certain uses and/or sharing of personal information, including sales of personal information, sharing of personal information for purposes of targeted advertising, or use of personal information for certain types of profiling decisions, as those terms are defined by applicable law. Please review Sections 8-13 for information on how to opt out in specific locations and jurisdictions.
 - **Sensitive Personal Information or Sensitive Data.** You may have certain rights with respect to your sensitive personal information or sensitive data as defined in the applicable law, including rights to consent and/or opt-out limit uses of such personal information. Please review Sections 8-13 for information on how to exercise these rights.
 - **Right to Non-Discrimination.** You have the right not to receive discriminatory treatment for the exercise of the privacy rights described above.

Exercising your privacy rights. If you are a resident of the U.S., Europe, or Canada and any of the notices below apply to you, please use the following information to exercise your rights. Please note that any request you submit to us is subject to an identification and residency verification process as permitted under applicable law, as well as certain other procedural requirements that may be noted in the sections below. Additionally, all requests are subject to certain exceptions under applicable law, which may vary. If you are a visually-impaired customer, a customer who has another disability or a customer who seeks support in other language, you may access your privacy rights by emailing us at contact@appcraftstudio.com. Except where otherwise noted, we will respond to your request within forty-five (45) days after receipt and we reserve the right to extend the response time by an additional forty-five (45) days when reasonably necessary and provided consumer notification of the extension is made within the first forty-five (45) days. As described below, in some jurisdictions, an authorized agent may submit a request to exercise your rights on your behalf.

How to submit a request. If you wish to exercise any of the rights in Sections 8-15 please send your request(s) using one of the following methods:

- **Email:** contact@appcraftstudio.com
- **Mail:** 128 rue de La Boétie – 75008 PARIS, France

We do not charge a fee to process or respond to your verifiable consumer request unless its excessive, repetitive, manifestly unfounded, or in accordance with applicable law. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Depending on applicable law, you may be limited in how many verifiable or authenticated consumer request you make within a twelve (12) month period. If we have collected information on your minor child, you may exercise the above rights on behalf of your minor child.

Additionally, in some jurisdictions, you may designate an authorized agent to submit a request on your behalf, and if so, we may require proof of the agent's authorization by you and/or verification of the agent's own identity. Generally, a rights request must include:

- Sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which must include, at a minimum, your first and last name and email address.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to the request.

We cannot respond to your request or provide you with personal data if we cannot verify or authenticate your identity or authority to make the request and confirm that the personal information relates to you.

You are not required to create an account with us to submit a verifiable or authenticated consumer request. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account. We will only use personal information provided in a verifiable or authenticated consumer request to verify your (or your authorized agent's as applicable) identity or authority to make the request.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Data Protection Officer. If you are a resident of Canada or the European Union, you may contact our Data Protection Officer at contact@appcraftstudio.com by mail using the contact information in Section 18.

7. International Transfers of Your Personal Information

Your information, including personal information, may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction. If you are located outside of the United States and choose to provide information to us, please note that we transfer the data, including personal information, to the United States and process it there. For such transfers, we take the necessary measures to ensure that your personal information receives an adequate level of protection.

Your acknowledgment of this Privacy Policy followed by your submission of such information represents your agreement to that transfer. If you do not wish for your personal information to be transferred outside of your state, province, country or other governmental jurisdiction, you should not share your personal data by using the Service.

We will take all the steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy and no transfer of your personal information will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

8. California Privacy Notice

This California Privacy Notice provides additional information regarding the personal information as defined in Section 1 about California residents that we collect, how we use it, what sources it is derived from, and who we disclose it to, and provides information regarding to California residents' rights, and our responsibilities, under the California Consumer Privacy Act and its amendments in the California Privacy Rights Act (“CCPA”), and other relevant California laws and regulations.

The CCPA provides California residents with rights to receive certain disclosures regarding the collection, use, and disclosure of personal information, as well as rights to access, correct, delete, and restrict the sale, use, and disclosure of certain personal information we collect about them. California residents also have the right not to receive discriminatory treatment by us for the exercise of your privacy rights under the CCPA.

If you are a visually-impaired customer, a customer who has another disability or a customer who seeks support in other language, you may access your privacy rights by emailing us at contact@appcraftstudio.com.

a. Personal Information We Collect

We may collect, or have collected, the categories of personal information about you as described in Section 1. For purposes of this section, personal information also includes personal information as described in California Civil Code Section 1798.80(e), which includes “**financial information**” as described in Section 1. Additionally, for purposes of this section, “**publicly available information**” includes: information is made available from federal, state, or local government records; information that a business has a reasonable basis to believe is lawfully available to the general public, either through widely distributed media, or by the consumer; and

information that is made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience. Certain of the personal information that we collect, as described above, may constitute “**sensitive personal information**” as defined by California law. This may include:

- Customer account login information; and
- Content of messages sent through the Service

b. How We Use Your Personal Information

We use the personal information we collect about you for all of the purposes outlined in Section 1 above.

When we collect sensitive personal information as described in Section 8(a) above, we do so for the following purposes:

- To provide and maintain the Service
- To facilitate interactive features
- For internal analytics
- For any purpose with your consent

c. Sources of Personal Information

We may collect personal information about you from the following categories of sources:

- **Directly from you and other users** through your interactions with and use of the Service as well as in relation to your participation in Company programs
- **Through cookies and tracking technologies**, as described in Section 2
- **From third parties**, including our third party service providers, business and marketing partners, analytics providers, ad network providers, ad agencies, and advertisers
- **From government agencies or public records**
- **From social media and other content platforms**, if you access the Service through a third-party connection or log-in or interact with us on these platforms

We may supplement the information described above with information we obtain from other sources, including from both online and offline information providers.

d. Whom We Disclose Personal Information To

We limit our disclosure of the categories of personal information above to our service providers for one or more **business purposes**. “**Business purposes**” means the reasonably necessary and proportionate use of personal information for our operational purposes, other purposes described in this Privacy Policy, for the operational purposes of our service providers and contractors, as well as other purposes compatible with the context in which the personal information was collected. This includes the business purposes described in Section 1.

We may “**sell**” and/or “**share**” share personal information with third party partners as part of targeted advertising initiatives. That sharing may constitute a “sale” and/or “share” under California law, even though we do not receive monetary payment for sharing or disclosing personal information to these third parties.

In the last 12 months (from the last updated date listed at the top of this Privacy Policy), we have “sold” or “shared” the following categories of personal information:

- Identifiers
- Commercial information
- Internet or other electronic network activity information

- Audio, electronic, visual, or similar information
- Education information
- Inferences

e. Your California Privacy Rights

If you are a California resident, you have the rights described in Section 6 and the following additional rights under applicable California law:

- **Right to Opt-Out of Sale and/or Sharing.** You have the right to opt-out of the sale and/or sharing of your personal information by a business. As noted in Sections 1-2, we may “sell” and/or “share” your personal information for purposes of cross-context behavioral advertising. You may opt-out by following the instructions in Section 6.
- **Right to Limit Use and Disclosure.** You have the right to limit the use or disclosure of your sensitive personal information to only the uses necessary for us to provide goods or services to you. We will not use or disclose your sensitive personal information after you have exercised your right unless you subsequently provide consent for the use of your sensitive personal information for additional purposes.
- **Sharing with third parties for their own direct marketing purposes.** We do not disclose this personal information to third parties for their own purposes without your consent. If you wish to request information regarding such practices under California’s “**Shine the Light**” Law, please contact us using the information provided in Section 6. You must include your full name, email address and postal address in your email or mail request so that we can verify your California residence and respond.

How to exercise your rights. You may exercise any of the rights described in this section by following the instructions in Section 6.

f. Notice of Right to Opt-Out

If you wish to opt-out of the “sale”/“sharing” of personal information for purposes of cross-context behavioral advertising as described in Sections 1-2, please follow the instructions in the in Section 6. Please note that we do not knowingly sell or share the personal information of minors under 16 years of age without legally-required affirmative authorization. If you are a parent or guardian and you believe that your child has provided us with information without your consent, please review Section 16 below and contact us by email at contact@appcraftstudio.com. We also encourage you to utilize the cookie preferences options that appear in the cookie banner on the Service. Finally, you may also visit the websites of the [Network Advertising Initiative](#) and the [Digital Advertising Alliance's Self-Regulatory Program for Online Behavioral Advertising](#) for more information about opting out of seeing targeted digital advertisements and how to opt bank in if desired. You may also learn about your options to opt-out of mobile app tracking by certain advertising networks through your device settings.

g. Notice of Financial Incentives

We may offer [**Type of financial incentive:** e.g. sweepstakes, promotions, and discounts on products or services] by [**How to participate:** e.g. joining email subscription lists or enrolling in other marketing opportunities]. The availability of these promotions to you at any given time will vary. If and when we offer such programs, we may ask for your personal information including: [**List types of personal information collected:** e.g. your first and last name, email address, phone number, and physical address] as a prerequisite to your participation.

Example language for different types of Financial Incentives:

- **Email Newsletter.** When you subscribe to our email newsletter, we may offer you special savings in the form of digital coupons for free or discounted products and announcements of sweepstakes, contests, and giveaways. In order to receive the newsletter, you must provide certain personal information, including [**Examples:** first and last name, valid email address, date of birth, phone number, and street address]. You will also be provided with the option to personalize your inbox by choosing the categories of our products that interest you, your language preference, and desired frequency of emails. To halt delivery, please click “unsubscribe” located at the bottom of any email newsletter.
- **Sweepstakes, contests, and giveaways.** From time to time, we may offer you the opportunity to participate in various branded sweepstakes, contests, and giveaways that offers prizes including free or discounted products, shopping sprees, and other rewards. The information required to participate in these opportunities may vary but can include [**Examples:** First and last name, valid email address, date of birth, phone number, and street address].
- **Physical Coupons.** We may offer you opportunities to purchase products from in-store locations where they are offered at discounted rates. The information required to participate in these opportunities may vary but may include [**Examples:** first and last name, valid email address, date of birth, phone number, street address, and zip code].
- **Surveys.** We may offer you product coupons and/or other incentives if you complete voluntary customer surveys through our websites. These surveys typically do not seek traditional identifying information like names or contact information but may ask for information relating to your shopping preferences and general demographics.
- **Co-Branded Marketing Opportunities.** From time to time, we may offer you the opportunity to participate in various co-branded opportunities with our marketing and advertising partners. The information required to participate in these opportunities may vary but may include [**Examples:** first and last name, valid email address, date of birth, phone number, and street address]. Please note that our marketing and advertising partners will receive your personal information and may use it for their own business purposes.
- **Reviews.** We rely on customers to help us improve our services, products, and marketing initiatives. If we solicit your feedback through opportunities to review our products, we may offer you exclusive access and discounted merchandise. In order to review our products, we may require you to provide certain personal information including [**Examples:** first and last name, valid email address, date of birth, phone number, information relating to your shopping preferences, general demographics, and street address].

You may opt-in to the above promotions by visiting the promotion site or navigating through your account with us. You may withdraw from these promotions at any time by contacting us at contact@appcraftstudio.com. If you withdraw from these programs, we will not contact you for at least twelve (12) months before requesting your participation again.

The value we place on personal information collected for these promotions varies, but we estimate it equals the additional spending per promotion participant, compared to individuals for whom we do not have email addresses, shopping history and preferences, or other collected information.

h. Retention of Personal Information

We will retain personal information for as long as needed or permitted in light of the purpose(s) for which it was obtained as described in Section 4.

9. Colorado Privacy Notice

This Colorado Privacy Notice provides additional information regarding personal data as defined in Section 1 about Colorado residents that we collect, how we use it, what sources it is derived from, and who we disclose it to, and provides information regarding to Colorado residents' rights, and our responsibilities, under the Colorado Privacy Act ("CPA") and other relevant Colorado laws and regulations.

The CPA provides Colorado residents with rights to receive certain disclosures and access regarding collection, use, sale, and sharing of personal data, as well as rights to delete, correct, and affirmatively consent to the use, disclosure, and sale of certain personal data we collect about them. Additionally, Colorado residents have the right to opt-out of targeted advertising, sale of their personal data, and profiling. Colorado residents also have the right not to receive discriminatory treatment by us for the exercise of their privacy rights. This Colorado Privacy Notice does not apply to certain personal data that is already subject to certain federal and state regulation.

If you are a visually-impaired customer, a customer who has another disability or a customer who seeks support in other language, you may access your privacy rights by emailing us at contact@appcraftstudio.com.

a. Personal Data We Collect

We may collect, or have collected, the categories of personal data about you as described in Section 1. For the purposes of this section, "**publicly available information**" includes: information that is lawfully made available from federal, state, or local government records and information that a business has a reasonable basis to believe the consumer has lawfully made available to the general public.

Sensitive Data. We do not collect "**sensitive data**" as that term is defined in the CPA.

b. How We Use Your Personal Data

We use the personal data we collect about you for all of the purposes outlined in Section 1 above. As noted in Section 9(a), we do not collect "**sensitive data**" as that term is defined under Colorado law.

c. Sources of Personal Data

We may collect personal information about you from the categories of sources described in Section 8(c).

d. Whom We Disclose Personal Data To

We limit our disclosure of the categories of personal data above to our service providers for one or more **business purposes**. "**Business purposes**" means the necessary, reasonable, and proportionate use of this personal data for the specific purposes described in this privacy policy. We may "**sell**" personal data with third party partners as part of targeted advertising initiatives. That sharing may constitute a "sale" under Colorado law, even though we do not receive monetary payment for sharing or disclosing personal data to these third parties.

In the last 12 months (from the last updated date listed at the top of this Privacy Policy), we have "sold" the following categories of personal information:

- Identifiers
- Commercial information
- Internet or other electronic network activity information

- Audio, electronic, visual, or similar information
- Education information
- Inferences

Please review the other disclosures in this Privacy Policy, including Sections 1-2 for more information about these practices, as well as your opt-out rights under Colorado law as to that activity as described in Sections 9(e) and 9 (f) below.

e. **Your Colorado Privacy Rights**

If you are a Colorado resident, you have the rights described in Section 6 and the following additional rights under applicable Colorado law in relation to your personal data, subject to certain exceptions:

- **Right to Opt-Out.** You have the right to opt-out of targeted advertising, our sale of your personal data, and profiling decisions that could produce legal or similarly significant effects.
- **Right to Provide Affirmative Consent.** We cannot process your sensitive data or your sensitive data inferences or use your personal data for certain purposes without your affirmative consent.

How to exercise your rights. You may exercise any of the rights described in this section by following the instructions in Section 6.

f. **Company Bona Fide Loyalty Program**

We may offer discounts on products to individuals who join our [**Loyalty Program(s)**]. This program awards [**Examples:** points and other incentives for purchasing our products)]. Program members also can accumulate points or earn discounts with our partners such as [**Names of Loyalty Partners**]. [**Provide additional information on the rewards program** (e.g., how rewards can be redeemed, special offers unique to the program, how members can personalize their experience, etc.)]. Members also often become the first to know about special offers, discounts, and promotions. You can join [**Loyalty Program(s)**] by [**Describe how to join the program(s)**]. During sign-up you will be asked for personal information such as [**Examples:** your first and last name, valid email address, date of birth, phone number, information relating to your shopping preferences, general demographics, and street address] in order to participate in the program.

Please note that if you exercise your Right to Delete your personal information with us, we will not be able to continue to offer our [**Loyalty Program**] to you because it awards points or incentives by tracking your purchases and other activities across time and among the various products, services, and features available on our sites.

10. Connecticut Privacy Notice

This Connecticut Privacy Notice provides additional information regarding the personal information as defined in Section 1 about Connecticut residents that we collect, how we use it, what sources it is derived from, and who we disclose it to, and provides information regarding to Connecticut residents' rights, and our responsibilities, under the Connecticut Data Privacy Act (“CTDPA”), and other relevant Connecticut laws and regulations.

The CTDPA provides Connecticut residents with rights to receive certain disclosures regarding the collection, use, and disclosure of personal information, as well as rights to receive certain disclosures and access regarding collection, use, sale, and sharing of personal data, as well as

rights to delete, correct, and affirmatively consent to the use, disclosure, and sale of certain personal data we collect about them. Connecticut residents also have the right not to receive discriminatory treatment by us for the exercise of your privacy rights under the CTDPA. If you are a visually-impaired customer, a customer who has another disability or a customer who seeks supports in other language, you may access your privacy rights by emailing us at contact@appcraftstudio.com

a. Personal Data We Collect

We may collect, or have collected, the categories of personal data about you as described in Section 1. For purposes of this section, “**publicly available information**” means information that is lawfully made available from federal, state, or local government records, or widely distributed media and information that a business has a reasonable basis to believe the consumer has lawfully made available to the general public.

Sensitive Data. We do not collect “**sensitive data**” as that term is defined in the CTDPA.

b. How We Use Your Personal Data

We use the personal data we collect about you for all of the purposes outlined in Section 1 above. As noted in Section 10(a), we do not collect “**sensitive data**” as that term is defined under Connecticut law.

c. Sources of Personal Data

We may collect personal information about you from the categories of sources described in Section 8(c).

d. Whom We Disclose Personal Data To

We limit our disclosure of the categories of personal data above to our service providers for one or more **business purposes**. “**Business purposes**” means the reasonably necessary and proportionate use of personal information, in a way that is adequate, relevant, and necessary for specific purposes described in this privacy policy, compatible with the nature and purpose(s) for the collection, use, and retention of the personal data.

We may “**sell**” personal data with third party partners as part of targeted advertising initiatives. That sharing may constitute a “sale” under Connecticut law, even though we do not receive monetary payment for sharing or disclosing personal data to these third parties.

In the last 12 months (from the last updated date listed at the top of this Privacy Policy), we have “sold” the following categories of personal information:

- Identifiers
- Commercial information
- Internet or other electronic network activity information
- Audio, electronic, visual, or similar information
- Education information
- Inferences

Please review the other disclosures in this Privacy Policy, including Sections 1-2 for more information about these practices, as well as your opt-out rights under Connecticut law as to that activity as described in Sections 10(e) below.

e. Your Connecticut Privacy Rights

If you are a Connecticut resident, you have the rights described in Section 6 and the following additional rights under applicable Connecticut law in relation to your personal data, subject to certain exceptions:

- **Right to Opt-Out.** You have the right to opt-out of targeted advertising, our sale of your personal data, and profiling decisions that could produce legal or similarly significant effects.
- **Right to Provide Affirmative Consent.** We cannot process your sensitive data or use your personal data for certain purposes without your affirmative consent.

How to exercise your rights. You may exercise any of the rights described in this section by following the instructions in Section 6.

11. Nevada Privacy Notice

While we do not sell personal information, Nevada residents nonetheless have the right to request to opt out of any future “**sale**” of their personal information under Nevada SB 220. If you are a Nevada resident and would like to make such a request, please follow the instructions in Section 6. You must include your full name, email address and postal address in your email or mail request so that we can verify your Nevada residence and respond. In the event we sell your personal information after the receipt of your request, we will make reasonable efforts to comply with such request.

12. Virginia Privacy Notice

This Virginia Privacy Notice provides additional information regarding the personal information as defined in Section 1 about Virginia residents that we collect, how we use it, what sources it is derived from, and who we disclose it to, and provides information regarding to Virginia residents’ rights, and our responsibilities, under the Virginia Consumer Data Protection Act (“**VCDPA**”), and other relevant Virginia laws and regulations.

The VCDPA provides Virginia residents with rights to receive certain disclosures and access regarding collection, use, sale, and sharing of personal information, as well as rights to delete, correct, and affirmatively consent to the use, disclosure, and sale of certain personal information we collect about them. Additionally, Virginia residents have the right to opt-out of targeted advertising, sale of their personal data, and profiling. Virginia residents also have the right not to receive discriminatory treatment by us for the exercise of their privacy rights. This Virginia Privacy Notice does not apply to certain personal information that is already subject to certain federal and state regulation.

If you are a visually-impaired customer, a customer who has another disability or a customer who seeks supports in other language, you may access your privacy rights by emailing us at contact@appcraftstudio.com

a. Personal Data We Collect

We may collect, or have collected, the categories of personal data about you as described in Section 1. For purposes of this section, “**publicly available information**” means information that is lawfully made available through federal, state, or local government records, or information that a business has a reasonable basis to believe is lawfully made available to the general public through widely distributed media, by the consumer, or by a person to whom the consumer has disclosed the information, unless the consumer has restricted the information to a specific audience.

Sensitive Data. We do not collect “**sensitive data**” as that term is defined in the VCDPA.

b. How We Use Your Personal Data

We use the personal data we collect about you for all of the purposes outlined in Section 1 above. As noted in Section 12(a), we do not collect “**sensitive data**” as that term is defined under Virginia law.

c. Sources of Personal Data

We may collect personal information about you from the categories of sources described in Section 8(c).

d. Whom We Disclose Personal Data To

We limit our disclosure of the categories of data above to our service providers for one or more **business purposes**. “**Business purposes**” means the reasonably necessary and proportionate use of personal data, in a way that is adequate, relevant, and necessary for specific purposes described in this Privacy Policy, compatible with the nature and purpose(s) for the collection, use, and retention of the personal data.

We may “**sell**” personal data with third party partners as part of targeted advertising initiatives. That sharing may constitute a “sale” under Virginia law.

In the last 12 months (from the last updated date listed at the top of this Privacy Policy), we have “sold” the following categories of personal information:

- Identifiers
- Commercial information
- Internet or other electronic network activity information
- Audio, electronic, visual, or similar information
- Education information
- Inferences

Please review the other disclosures in this Privacy Policy, including Sections 1-2 for more information about these practices, as well as your opt-out rights under Connecticut law as to that activity as described in Sections 12(e) below.

e. Your Virginia Privacy Rights

If you are a Virginia resident, you have the following rights described in Section 6 and the following additional rights under applicable Virginia law in relation to your personal data, subject to certain exceptions:

- **Right to Opt-Out.** You have the right to opt-out of targeted advertising, our sale of your personal data, and profiling decisions that could produce legal or similarly significant effects concerning the consumer.
- **Right to Provide Affirmative Consent.** We cannot process your sensitive data or use your personal data for certain purposes without your affirmative consent.

How to exercise your rights. You may exercise any of the rights described in this section by following the instructions in Section 6.

If you wish to appeal our decision with regard to a request that you have previously made, please contact us using the information above or notify the Office of the Attorney General of Virginia by clicking [here](#).

Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken, including an explanation of our reasons in reaching the decision. If the appeal is denied, you may contact Virginia’s Office of Attorney General by phone at (804) 786-2071, written correspondence to 202 North 9th Street, Richmond, Virginia 23219, or by accessing: <https://www.oag.state.va.us/consumer-protection/index.php/file-a-complaint>.

13. Utah Privacy Notice

This Utah Privacy Notice provides additional information regarding the personal information as defined in Section 1 about Utah residents that we collect, how we use it, what sources it is derived from, and who we disclose it to, and provides information regarding to Utah residents' rights, and our responsibilities, under the Utah Consumer Privacy Act (“UCPA”) and other relevant Utah laws and regulations.

The UCPA provides Utah residents with rights to receive certain disclosures and access regarding collection, use, sale, and sharing of personal information, as well as rights to delete, and opt-out to the use, disclosure, and sale of certain personal information we collect about them. Additionally, Utah residents have the right to opt-out of targeted advertising, sale of their personal data, and profiling. Utah residents also have the right not to receive discriminatory treatment by us for the exercise of their privacy rights. This Utah Privacy Notice does not apply to certain personal information that is already subject to certain federal and state regulation. If you are a visually-impaired customer, a customer who has another disability or a customer who seeks support in other language, you may access your privacy rights by emailing us at contact@appcraftstudio.com.

a. Personal Data We Collect

We may collect, or have collected, the categories of personal data about you as described in Section 1. For purposes of this section, “**publicly available information**” means information that a person lawfully obtains from a record of a governmental entity, or widely distributed media and information that a business has a reasonable basis to believe the consumer has lawfully made available to the general public, or information an individual has not restricted to a specific audience.

Sensitive Data. We do not collect “**sensitive data**” as that term is defined in the UCPA.

b. How We Use Your Personal Data

We use the personal data we collect about you for all of the purposes outlined in Section 1 above. As noted in Section 13(a), we do not collect “**sensitive data**” as that term is defined under Utah law.

c. Sources of Personal Data

We may collect personal information about you from the categories of sources described in Section 8(c).

d. Whom We Disclose Personal Data To

We limit our disclosure of the categories of data above to our service providers for one or more **business purposes**. “**Business purposes**” means the use of personal data for purposes consistent with your reasonable expectations.

We may “**sell**” personal data with third party partners as part of targeted advertising initiatives.

That sharing may constitute a “**sale**” under Utah law.

In the last 12 months (from the last updated date listed at the top of this Privacy Policy), we have “**sold**” the following categories of personal information:

- Identifiers
- Commercial information
- Internet or other electronic network activity information
- Audio, electronic, visual, or similar information
- Education information
- Inferences

Please review the other disclosures in this Privacy Policy, including Sections 1-2 for more information about these practices, as well as your opt-out rights under Connecticut law as to that activity as described in Sections 13(e) below.

e. Your Utah Privacy Rights

If you are a Utah resident, you have the following rights described in Section 6 and the following additional rights under applicable Utah law in relation to your personal data, subject to certain exceptions:

- **Right to Opt-Out.** You have the right to opt-out of targeted advertising and our sale of your personal data.

How to exercise your rights. You may exercise any of the rights described in this section by following the instructions in Section 6.

14. European Privacy Notice

This European Privacy Notice applies to any individuals located within the European Economic Area (EEA), UK, or Switzerland from whom we may have collected personal data from any source, including through your use of the Service. We provide this European Privacy Notice to comply with applicable privacy laws, including the General Data Protection Act (“GDPR”), the UK GDPR, and related laws, regulations, and guidance from the European Union and/or its member states. Any capitalized term used and not otherwise defined below has the meaning assigned to it in our Privacy Policy.

European law provides individuals located in Europe with rights to receive certain disclosures regarding the collection, use, and sharing of personal data, as well as rights to be informed, access, rectification, erasure, restrict processing, data portability and to object with respect to collected personal data. For the purposes of this European Privacy Notice, “**personal data**” means any information relating to an identified or identifiable natural person.

Basis for processing your personal data. We rely on one or more legal bases to process your personal data under applicable law. We may process personal data (i) as necessary to perform our contractual obligations to you, including, but not limited to, those obligations in our terms of use; (ii) as necessary to pursue our legitimate interests as further detailed below; (iii) as necessary for our compliance with our legal obligations such as a request or order from courts, law enforcement or other government authorities; and/or (iv) with your consent, including to send you marketing email messages and other information that may be of interest to you, which you may withdraw at any time.

Legitimate business interests. We may collect, process, and maintain personal data to pursue the legitimate business interests outlined below. To determine these legitimate interests, we balance our legitimate interests against the legitimate interests and rights of you and others and only process personal data in accordance with those interests where they are not overridden by your data-protection interests or fundamental rights and freedoms.

While our legitimate interests are most extensively detailed in Section 1 of our Privacy Policy, they generally include:

- **Provide, improve, and develop our Sites, Products, and Services,** including to deliver your requested services, send you messages and provide user support, customize the Services to better fit your needs as a user, develop new products and services, and perform internal analytics and research and development. This also includes sharing personal data with our trusted service providers that provide services on our behalf.

- **Protect you and others and to create and maintain a trusted environment**, such as to comply with our legal obligations, to ensure compliance our agreements with you and other third parties, to ensure safe, secure, and reliable Service, and to detect and prevent wrongdoing and crime, assure compliance with our policies, and protect and defend our rights, interests, and property. In connection with the activities above, we may conduct internal research and profiling based on your interactions on various Sites, content you submit to the Sites, and information obtained from third parties.
- **Provide, personalize, measure and improve our marketing**, including to send you promotional messages and other information that may be of interest to you with your consent. We may also use personal data to understand our user base and the effectiveness of our marketing. This processing is done pursuant to our legitimate interest in undertaking marketing activities to offer products or services that may be of interest to you.

In certain circumstances, individuals located within the EEA, UK, and Switzerland are entitled to the following data protection rights:

- **Right to Access.** You have the right to request confirmation of whether we process personal data relating to you, and if so, to request a copy of that personal data.
- **Right to Erasure.** You have the right to request that we erase your personal data in certain circumstances provided by law.
- **Right to Rectification.** You have the right to request to have your personal data corrected or updated if that information is inaccurate, outdated, or incomplete.
- **Right to Object to Processing.** You have the right to object to our processing of your personal data.
- **Right to Restrict Processing.** You have the right to request that we restrict the processing of your personal data.
- **Right to Data Portability.** You have the right to request that we provide you with a copy of your personal data in a structured, machine-readable and commonly used format.
- **Right to Withdraw Consent.** You also have the right to withdraw your consent at any time where we rely on your consent to process your personal data. Please note that we may ask you to verify your identity before responding to such requests. Please note, we may not be able to provide Service without some necessary data. You have the right to complain to a Data Protection Authority about our collection and use of your personal data. For more information, please contact your local data protection authority in the European Economic Area (EEA). You can view the contact information for your data protection authority [here](#).

To exercise your data protection rights described above, please follow the instructions in Section 6.

15. Canadian Privacy Notice

a. Personal Information We Collect

For the purposes of this Canadian Privacy Notice, except where a different definition is noted, “**personal information**” means information about an identifiable individual. We may collect personal information from or about you as detailed in Section 1. Certain types of personal information that we collect may be considered sensitive information, which we will not process without your affirmative consent. This includes account log-in in combination with required credentials.

b. How We Collect Your Personal Information

We may collect personal information from you as detailed in Sections 1 and 8(c).

c. What We Do With Your Personal Information

We may collect, use, or disclose personal information about you for the purposes detailed in Section 1. This includes sharing your personal information with third parties for their own direct marketing purposes and for online behavioral advertising. This includes offering you marketing opportunities when you participate in certain programs as described in Sections 8(g) and 9(f).

d. Disclosure and Transfer of Your Information

We may disclose and transfer personal information from you as detailed in Sections 1 and 3.

e. Your Canadian Privacy Rights

Under Canadian law, you have the right to access, correct, and delete your personal information as well as the right to withdraw your consent in certain circumstances. In the event that you have already consented to the collection, use and/or disclosure of your personal data, you may subsequently “opt out” at any time, subject to legal or contractual restrictions and reasonable notice by referring to the information in Section 6.

If you are a parent or guardian and you believe that your child has provided us with information without your consent, please review Section 16 below and contact us by email at contact@appcraftstudio.com

f. Data Retention Period

We will keep your personal information only as long as is reasonably necessary as detailed in Section 4.

g. Data Security

We use commercially reasonable administrative, technical, and physical safeguards appropriate to the risks and information sensitivity to help protect and secure your personal information as detailed in Section 5.

16. Children's Privacy

Our Services are not intended for use by children under the age of 13 (“**children**” and “**child**”) and we use reasonable age verification measures to limit access to the Service. We do not knowingly collect personal information from children under 13. If you become aware that a child has provided us with personal information, please contact us. If we become aware that we have collected personal information from children without verification of parental consent, we take steps to remove that information from our servers.

17. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update “effective date” at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

18. Contact Us

If you have any questions about this Privacy Policy, please contact us:

- **By email:** contact@appcraftstudio.com
- **Mail:** 128 rue de La Boétie – 75008 PARIS, FRANCE