CALIFORNIA PRIVACY NOTICE

**Date Last Updated:** May \_\_, 2020

# OVERVIEW

This California Privacy Notice (“Notice”) applies to Paparazzi and is effective as of the Date Last Updated above. For California consumers, this Notice supplements the practices we have adopted for our website as described in our [Privacy Policy](https://paparazziaccessories.com/pages/privacy/), to describe our company’s collection, use, and disclosure of personal information. All defined terms within the California Consumer Privacy Act, including those defined in Cal. Civ. Code § 1798.140, apply for the purposes of interpreting this Notice. Terms which are capitalized but not defined in this Notice have the meanings assigned in the [Privacy Policy](https://paparazziaccessories.com/pages/privacy/).

BY ACCESSING OR USING OUR WEBSITE OR SUBMITTING INFORMATION TO US, OR BY REGISTERING ON OUR WEBSITE AFTER BEING PROVIDED THIS NOTICE, YOU UNDERSTAND AND CONSENT TO OUR USE OF YOUR INFORMATION AS DESCRIBED HEREIN.

# YOUR CALIFORNIA PRIVACY RIGHTS

As a California consumer, you have the right to request that we disclose what personal information about you we collect, use, disclose, and sell. More specifically, subject to the exceptions contained in the California Consumer Privacy Act or otherwise established by law or regulation, you have rights to the following without charge:

*Disclosure of Personal Information We Collect About You*

You have the right to know, upon submission of a verifiable request, the categories of personal information we have collected about you, the categories of sources from which we collect personal information, the business or commercial purpose for collecting or selling personal information, the categories of Third Parties with whom we share personal information, if any, and the specific pieces of personal information we have collected about you.

We will not retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained; not reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; and reserve our right not to provide personal information to you more than twice in a 12-month period.

*Disclosure of Personal Information Sold or Disclosed for a Business Purpose*

In connection with personal information we may sell for a business or commercial purpose, if any, you have the right to know the categories of personal information about you that we sold, the categories of Third Parties to whom we sold the personal information, and the business or commercial purpose for selling that information.

In connection with personal information we may disclose for a business or commercial purpose, if any, you have the right to know the categories of personal information that we disclosed about you for a business purpose, and the categories of third parties to whom we disclosed personal information for a business purpose.

*Deletion of Personal Information*

Subject to the exceptions set out below and allowed by law, upon your submission of a verifiable request you have the right to deletion of your personal information from our records, and to have us direct our service providers delete your personal information from their records.

We are not required to, and reserve our right not to, delete your personal information it if is necessary to complete the transaction for which the personal information was collected or reasonably anticipated within the context of our ongoing business relationship with you, provide a good or service requested by you, or otherwise perform a contract between you and us; detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity; debug, identify, or repair errors that impair existing intended functionality; exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law; comply with the California Electronic Communications Privacy Act; enable solely internal uses that are reasonably aligned with your expectations based on the your relationship with us; comply with an existing legal obligation; and otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

*Children’s Personal Information*

We do not knowingly collect personal information from individuals under 18 years of age, and do not sell the personal information of minors under 16 years of age without affirmative authorization. Our website is available only to individuals and entities that can form legally binding contracts under applicable law. You warrant that you are eighteen (18) years of age or older to use our website. If you do not qualify, you may not use our website. If you a parent or legal guardian, please do not to allow your children to submit personal information to us without your authorization.

*Freedom from Discrimination*

You have the right to not be discriminated against by us if you exercise any of your rights under the California Consumer Privacy Act. This means we will not do any of the following on the basis of your exercise of these rights: deny goods or services to you; charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; provide a different level or quality of goods or services to you; or suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

*Sale of Personal Information*

We do not sell personal information.

# PERSONAL INFORMATION WE COLLECT

Often you will know when we collect personal information from you as you will actively provide it to us for a stated purpose. The information we collect includes name, address, phone number, email, web analytics reporting, credit card number or other payment information, and tax identification number. In addition to the information described in our [Privacy Policy](paparazziaccessories.com/pages/privacy), below is a description of types of personal information we collect in certain circumstances:

*Communications:* If you choose to contact us for any purpose, we will collect your name, contact details, and the date and time of your contact along with the content of your message. You may also choose to receive news, updates, or client alerts from us. When you sign up, we may collect your name, company, email address, and areas of interest.

*Events:* We collect personal information about you if you register for conference or other events we host or sponsor. This personal information may include your name, address, title, company, phone number, and email address, as well as specific information relevant to the event for which you register.

*Other sources:* We may receive personal information about you from other sources, including third parties that help us update, expand, and analyze our records, identify new customers, or prevent or detect fraud. We may also receive information about you from social media platforms, for example when you interact with us on those platforms or access our social media content. Information we receive through such platforms is governed by the privacy settings, policies, and/or procedures of the platform, and we encourage you to review them.

# SOURCES FROM WHICH WE COLLECT PERSONAL INFORMATION

In most cases, we collect personal information directly from consumers with which we interact. We also collect information from the following additional categories of sources:

* Independent Consultants.
* Data Analytics Providers.
* Email Marketing Providers.
* Payment Platforms.
* Service Providers.
* Social Networks.

# PURPOSES FOR WHICH WE COLLECT PERSONAL INFORMATION

We collect personal information in order to suppport our independent consultants and provide them with everything they need to sell Paparazzi Accessories; and to allow customers to purchase Paparazzi Accessories directly through our independent consultants’ online storefronts.

In addition to those purposes and the purposes described in our Privacy Policy, we also collect your personal information for the purposes of detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity; debugging to identify and repair errors that impair existing intended functionality; short-term, transient use, where the personal information is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter your experience outside the current interaction; performing services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling transactions, verifying client information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on our behalf; and undertaking activities to verify or maintain the quality or safety of services that are owned or controlled by us, and to improve, upgrade, or enhance those services.

Please note that we may process your personal information without your knowledge or consent, as required or permitted by law. We consider de-identification and aggregation of personal information to be compatible with the purposes listed above and in your interest, because the anonymization of such information reduces the likelihood of improper disclosure of that information.

# HOW WE SHARE PERSONAL INFORMATION

We generally disclose personal information as necessary to provide Paparazzi Accessories and support our Independent Consultants. In addition to the sharing described in our Privacy Policy, we also share personal information among our service providers and other third parties as described below:

*Service Providers*

We may from time to time use business partners, suppliers, and sub-contractors to assist us with the provision of services to you (for example, without limitation, website hosting, web analytics, maintenance services, database management, billing, payment processing, fraud protection, credit risk reduction, marketing, product research, or improvement of services). These entities have access to your personal information only to perform the respective tasks assigned to them on our behalf, and are obligated not to disclose or use it for any other purpose. For the purposes of this Notice, these are our “Service Providers.”

*Third Parties*

We may share personal information with the following categories of third parties: advertising networks, data analytics providers, government entities, operating systems and platforms, and social networks. For the purposes of this Notice, “Third Party” or “Third Parties” means third party as defined by the California Consumer Privacy Act, and includes parties that may sell, retain, use, or disclose personal information for certain purposes beyond the limited scope of our contract or direct business relationship with such entities.

*Other Reasons for Which We Will Share Personal Information*

We may cooperate with government and law enforcement officials as required by applicable law and/or in the course of legal proceedings. If you give us permission, or if we believe doing so is required or appropriate, we may disclose personal information to government or law enforcement officials or private parties in response to lawful requests, to comply with a legal obligation, to enforce or apply our terms and conditions, to protect our services, our rights, and/or the safety of the public or any person, or to prevent or stop any illegal, unethical or legally actionable activity (including for the purposes of fraud protection).

We may share some or all of your personal information in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction, or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, personal information may also be transferred as a business asset. If another company or individual acquires our business, or assets, that company or individual will possess the personal information collected by us and will assume the rights and obligations regarding your personal information as described in this Notice.

*Categories of Personal Information Collected, Disclosed, and Sold.*

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| --- | --- | --- |
| Category of Personal Information Collected | Categories of Third Parties to Whom Sold in the Prior 12 Months  | Categories of Third Parties to Whom Disclosed for a Business Purpose |
| Individual Identifiers (e.g., real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers) | Data Analytics Providers\* | Independent Consultants; Email Marketing Providers |
| Customer records that identify, relate to, describe, or are capable of being associated with, a particular individual (e.g. name, address, telephone number, education, employment history, credit card or debit card number) | Data Analytics Providers\* | Independent Consultants; Email Marketing Providers; Payment Processors |
| Characteristics of protected classifications under California or Federal law (e.g., your gender or age)  | None | None |
| Commercial information (e.g., information regarding products or services purchased, obtained, or considered) | None | Independent Consultants |
| Biometric information. | None | None |
| Internet or Other Electronic Network Activity Information (e.g., browsing history, search history, and information regarding your interactions with our website)  | Data Analytics Providers\* | None |
| Geolocation data. | None | None |
| Audio, electronic, visual, thermal, olfactory, or similar information. | None | None |
| Professional or employment-related information. | None | None |
| Education information.  | None | None |
| Inferences drawn from any of the information identified above.  | None | None |

\*Our website uses Google Analytics. We have configured Google Analytics such that we do not sell personal information, however this option was previously unavailable and Google Analytics accordingly received web browsing information from our website in a manner that may have been considered a “sale” within the 12 months preceding this policy.

The above chart does not include information collected for employment related purposes or where you communicate or transact with us solely in the context of acting on behalf of a company, partnership, sole proprietorship, nonprofit, or government agency to engage in due diligence regarding, or providing or receiving a product or service to or from such entity.

The categories of information we collect for employment related purposes are: individual identifiers; customer records that identify, relate to, describe, or are capable of being associated with, a particular individual; characteristics of protected classifications under California or federal law; internet or other electronic network activity; professional or employment-related information; and education information.

# HOW TO EXERCISE YOUR RIGHTS

Unless otherwise specified, to exercise any of your rights described in this Notice, please complete a data subject request form available [here](paparazziaccessories.com/pages/privacy/requests) or call us toll-free at 1-855-967-2727.

In order to verify your request, you will need to provide us with enough information to identify you, verify your identity and address, and a description of what right you wish to exercise along with any information to which your requests relates.

You may also designate an authorized agent to make a request under the California Consumer Privacy Act on your behalf. In order to fulfill your request to know or delete submitted by an authorized agent, you must provide the authorized agent written permission to do so, and we may require you verify your own identity with us directly.

We reserve our right not to grant requests for which we cannot verify that the person making the request is the person about whom we collected information or someone authorized to act on such person’s behalf. Any personal information we collect for verification in connection with a request will be used solely for the purposes of verification. You will not have to pay a fee to exercise your rights described herein. However, we may charge a reasonable fee or decline to comply with your request if your request is clearly unfounded, repetitive, or excessive. You may only make a request to know or receive personal information twice within a 12-month period.

# CHANGES TO THIS PRIVACY NOTICE

We may update this Notice from time to time, in our sole discretion. When we do so, we will post the new Notice on our website. You should consult this Notice regularly for any changes. Continued use of services following posting of such changes constitutes your acknowledgement of such changes and agreement to be bound by the changes. If you do not agree, you should immediately discontinue your use of our website and services.

# ACCESSIBILITY NOTICE

For consumers who require this Notice in an alternative formation, it is provided on the Paparazzi website in a format that is compatible with text-to-speech technologies. If you require additional formats or assistance, please contact us at the address, email, or toll-free phone number below.

# CONTACT US

If you have questions regarding this Notice or our treatment of your personal information, you may contact us at the following:

Paparazzi Accessories

Attn: California Privacy

36 N 1000 W

Hurricane, UT 84737

1-855-967-2727

privacy@paparazziaccessories.com

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of personal information the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year.

To request a copy of the information disclosure provided by us pursuant to Section 1798.83 of the California Civil Code, your request must include “Shine The Light Request” in the subject or first line of the request and include your name, street address, city, state, and zip code. You must send your request to us via e-mail or mailing address above.

Please note that under this law we are not required to respond to your request more than once per calendar year, nor are we required to respond to any request that is not sent to the e-mail or mailing address provided.

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