# **Privacy policy**

Beauty Below LLC is committed to protecting the private sensitive information of our customers. We have revised our Privacy Policy to reflect our commitment, and we strongly urge you to take some time to review the new version below.

#### INFORMATION COLLECTION:

### Registration

In order to use some of our services, we ask our customers to give us contact information (name, address, and phone number) from our newsletter section. We use this information to contact customers about services or products that may interest them. We also ask our customers to give us their e-mail addresses. We DO NOT distribute e-mail addresses or phone numbers outside of Beauty Below LLC, its parent, subsidiaries, affiliates, and strategic business partners.

#### Cookies

A cookie is a piece of data stored on the user's computer tied to information about the user. Usage of a cookie is in no way linked to any personally identifiable information while on our site. We use both session ID cookies and persistent cookies. For the session ID cookie, once users close the browser, the cookie simply terminates. A persistent cookie is a small text file stored on the user's hard drive for an extended period of time. Users can set up their web browser to inform them when cookies are set or to prevent cookies from being set.

### **Profile**

We store information that we collect through cookies and online forms. A profile is stored information that we keep on individual users that details their usage of our product. Consequently, collected information is tied to the users' personally identifiable information to provide offers and improve the content of the site for the user. This profile is used to tailor a user's visit to our website, and to direct pertinent marketing promotions to them.

#### Information Use

We provide information about our intimate care. Since our customers often have widely differing uses for our products and services, our strongly held belief and experience is that the more we know about our customers, the more value we can offer them. We use the information our customers provide during our newsletter section to offer the greatest interest and value to them.

## Third-Party Advertising

The ads appearing on our website are delivered to our customers by our web advertising partners. Information about our customers' visit to this site, such as a number of times they have viewed an ad (but not username, address, or other contact information), is used to serve ads to users on our website.

This privacy statement covers the use of cookies by Beauty Below LLC only and does not cover the use of cookies by any advertisers.

### COMMUNICATIONS FROM THE SITE:

## Special Offers and Updates

We send all new members a welcoming e-mail. Established members will occasionally receive information on products, services, and special deals. Out of respect for the privacy of our users, we present the option to not receive these types of communications in these e-mails.

### Newsletters

If a user wishes to subscribe to our newsletters, we ask for contact information such as name and e-mail address. Out of respect for our users' privacy, we provide a way to opt out of these communications.

## Service Announcements

On rare occasions, it is necessary to send out a strictly service-related announcement. For instance, if our website is temporarily suspended for maintenance, we might send users an email. However, these communications are not promotional in nature.

### SHARING:

# Legal Disclaimer

Though we make every effort to preserve customer privacy, we may need to disclose personal information when required by law wherein we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order, or legal process served on our website.

### Sharing With Third Parties

We do NOT share our customers' e-mail addresses with third parties, except for when required by law (see legal disclaimer). In order to present our customers with potentially interesting opportunities, we do occasionally share name and mailing address information with certain third parties. We believe that our customers will benefit from these arrangements, but out of respect of our client's privacy, we will remove such information from disclosure upon request (via e-mail to info@beautybelowmd.com) by our customers.

## Choice/Opt-out

Our customers are given the opportunity to 'opt-out' of having their information used for purposes not directly related to our site at the point where we ask for information. Customers who no longer wish to receive our newsletters and promotional communications via e-mail may opt-out of receiving these communications by clicking on the link provided in the e-mail or by sending us an e-mail us at info@beautybelowmd.com.

## Security

We take every precaution to protect our customers' information. When customers submit sensitive information via our website, their information is protected both online and offline.

When our free sample form asks users to enter sensitive information, that information is encrypted and is protected by a secure password-protected database.

We also do everything in our power to protect user-information offline. We restrict all of our customers' information to our office, and only employees who need the information to perform a specific job are granted access to personally identifiable information. Our employees must use passwords to access the information and are kept up to-date on our security and privacy practices.

Finally, the servers that store personally identifiable information are kept in a secure environment.

If you have any questions about the security at our website, please contact us via e-mail at to info@beautybelowmd.com.

## Supplementation of Information

To fulfill our obligation to our customers, it is sometimes necessary that we supplement the information that we receive with information from third-party sources.

## Notification of Changes

If we decide to change our privacy policy, we will post those changes to this privacy statement, the homepage, and other places we deem appropriate, so our customers are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

## **Contact Information**

If you have any questions or suggestions regarding our privacy policy, please contact us at:

Beauty Below LLC 13016 Eastfield Rd. Ste 200 Huntersville, NC 28078 info@BeautyBelowMD.com

This Privacy Policy describes how beautybelowmd.com (the "Site" or "we") collects, uses, and discloses your Personal Information when you visit or make a purchase from the Site.

# **Collecting Personal Information**

When you visit the Site, we collect certain information about your device, your interaction with the Site, and information necessary to process your purchases. We may also collect additional

information if you contact us for customer support. In this Privacy Policy, we refer to any information that can uniquely identify an individual (including the information below) as "Personal Information". See the list below for more information about what Personal Information we collect and why.

## **Device** information

- Examples of Personal Information collected: version of web browser, IP address, time zone, cookie information, what sites or products you view, search terms, and how you interact with the Site.
- **Purpose of collection:** to load the Site accurately for you, and to perform analytics on Site usage to optimize our Site.
- **Source of collection:** Collected automatically when you access our Site using cookies, log files, web beacons, tags, or pixels
- **Disclosure for a business purpose:** shared with our processor Shopify

# Order information

- Examples of Personal Information collected: name, billing address, shipping address, payment information (including credit card numbers, email address, and phone number.
- **Purpose of collection:** to provide products or services to you to fulfill our contract, to process your payment information, arrange for shipping, and provide you with invoices and/or order confirmations, communicate with you, screen our orders for potential risk or fraud, and when in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.
- Source of collection: collected from you.
- **Disclosure for a business purpose:** shared with our processor Shopify, sales channels, payment gateways, shipping, and fulfillment apps.

## Customer support information

- Examples of Personal Information collected: names, email address, phone number
- **Purpose of collection:** to provide customer support.
- Source of collection: collected from you.
- Disclosure for a business purpose:

# **Minors**

The Site is not intended for individuals under the age of 18. We do not intentionally collect Personal Information from children. If you are the parent or guardian and believe your child has provided us with Personal Information, please contact us at the address below to request deletion.

# **Sharing Personal Information**

We share your Personal Information with service providers to help us provide our services and fulfill our contracts with you, as described above. For example:

- We use Squarespace to power our online store. You can read more about how Squarespace uses your Personal Information here: https://www.squarespace.com/privacy.
- We may share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant, or other lawful requests for information we receive, or to otherwise protect our rights.

# **Behavioral Advertising**

As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For example:

- We use Google Analytics to help us understand how our customers use the Site. You can read more about how Google uses your Personal Information here: <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>. You can also opt-out of Google Analytics here: <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>.
- We share information about your use of the Site, your purchases, and your interaction with our ads on other websites with our advertising partners. We collect and share some of this information directly with our advertising partners, and in some cases through the use of cookies or other similar technologies (which you may consent to, depending on your location).

For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work.

You can opt-out of targeted advertising by:

- FACEBOOK https://www.facebook.com/settings/?tab=ads
- GOOGLE <a href="https://www.google.com/settings/ads/anonymous">https://www.google.com/settings/ads/anonymous</a>
- *BING* <a href="https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads/">https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads/</a>

Additionally, you can opt-out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: http://optout.aboutads.info/.

# **Using Personal Information**

We use your Personal Information to provide our services to you, which includes: offering products for sale, processing payments, shipping and fulfillment of your order, and keeping you up to date on new products, services, and offers.

#### Lawful basis

Pursuant to the General Data Protection Regulation ("GDPR"), if you are a resident of the European Economic Area ("EEA"), we process your personal information under the following lawful bases:

- Your consent.
- The performance of the contract between you and the Site.
- Compliance with our legal obligations.
- To protect your vital interests.
- To perform a task carried out in the public interest.
- For our legitimate interests, which do not override your fundamental rights and freedoms.

# Retention

When you place an order through the Site, we will retain your Personal Information for our records unless and until you ask us to erase this information. For more information on your right of erasure, please see the 'Your rights' section below.

# **Automatic decision-making**

If you are a resident of the EEA, you have the right to object to processing based solely on automated decision-making (which includes profiling), when that decision-making has a legal effect on you or otherwise significantly affects you.

We *DO NOT* engage in fully automated decision-making that has a legal or otherwise significant effect using customer data.

Our processor Squarespace uses limited automated decision-making to prevent fraud that does not have a legal or otherwise significant effect on you.

Services that include elements of automated decision-making include:

• Temporary deny list of IP addresses associated with repeated failed transactions. This denial list persists for a small number of hours.

• Temporary deny list of credit cards associated with denied listed IP addresses. This denia list persists for a small number of days.

# **Selling Personal Information**

Our Site sells Personal Information, as defined by the California Consumer Privacy Act of 2018 ("CCPA").

# Your rights

# **GDPR**

If you are a resident of the EEA, you have the right to access the Personal Information we hold about you, to port it to a new service, and to ask that your Personal Information be corrected, updated, or erased. If you would like to exercise these rights, please contact us through the contact information below.

Your Personal Information will be initially processed in Ireland and then will be transferred outside of Europe for storage and further processing, including to Canada and the United States.

# **CCPA**

If you are a resident of California, you have the right to access the Personal Information we hold about you (also known as the 'Right to Know'), to port it to a new service, and to ask that your Personal Information be corrected, updated, or erased. If you would like to exercise these rights, please contact us through the contact information below [OR INSERT ALTERNATIVE INSTRUCTIONS FOR SENDING ACCESS, ERASURE, CORRECTION, AND PORTABILITY REQUESTS].

If you would like to designate an authorized agent to submit these requests on your behalf, please contact us at the address below.

# **Cookies**

A cookie is a small amount of information that's downloaded to your computer or device when you visit our Site. We use a number of different cookies, including functional, performance,

advertising, and social media or content cookies. Cookies make your browsing experience better by allowing the website to remember your actions and preferences (such as login and region selection). This means you don't have to re-enter this information each time you return to the site or browse from one page to another. Cookies also provide information on how people use the website, for instance whether it's their first time visiting or if they are a frequent visitor.

We use the following cookies to optimize your experience on our Site and to provide our services.

# **Cookies Necessary for the Functioning of the Store**

Name	Function
$\_ab$	Used in connection with access to admin.
_secure_session_id	Used in connection with navigation through a storefront.
cart	Used in connection with shopping cart.
cart_sig	Used in connection with checkout.
cart_ts	Used in connection with checkout.
checkout_token	Used in connection with checkout.
secret	Used in connection with checkout.
secure_customer_sig	Used in connection with customer login.
storefront_digest	Used in connection with customer login.
_shopify_u	Used to facilitate updating customer account information.

# **Reporting and Analytics**

Name	Function
_tracking_consent	Tracking preferences.

_landing_page	Track landing pages
_orig_referrer	Track landing pages
_s	Shopify analytics.
_shopify_s	Shopify analytics.
_shopify_sa_p	Shopify analytics relating to marketing & referrals.
_shopify_sa_t	Shopify analytics relating to marketing & referrals.
_shopify_y	Shopify analytics.
y	Shopify analytics.

[INSERT OTHER COOKIES OR TRACKING TECHNOLOGIES THAT YOU USE]

The length of time that a cookie remains on your computer or mobile device depends on whether it is a "persistent" or "session" cookie. Session cookies last until you stop browsing and persistent cookies last until they expire or are deleted. Most of the cookies we use are persistent and will expire between 30 minutes and two years from the date they are downloaded to your device.

You can control and manage cookies in various ways. Please keep in mind that removing or blocking cookies can negatively impact your user experience and parts of our website may no longer be fully accessible.

Most browsers automatically accept cookies, but you can choose whether or not to accept cookies through your browser controls, often found in your browser's "Tools" or "Preferences" menu. For more information on how to modify your browser settings or how to block, manage or filter cookies can be found in your browser's help file or through such sites as <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a>.

Additionally, please note that blocking cookies may not completely prevent how we share information with third parties such as our advertising partners. To exercise your rights or opt-out of certain uses of your information by these parties, please follow the instructions in the "Behavioral Advertising" section above.

# **Do Not Track**

Please note that because there is no consistent industry understanding of how to respond to "Do Not Track" signals, we do not alter our data collection and usage practices when we detect such a signal from your browser.

# **Changes**

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

# **Contact**

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at [email address] or by mail using the details provided below:

Beauty Below LLC 13016 Eastfield Rd. Ste 200 Huntersville, NC 28078, United States

Last updated: March 2023

If you are not satisfied with our response to your complaint, you have the right to lodge your complaint with the relevant data protection authority. You can contact your local data protection authority, or our supervisory authority here: <a href="https://ico.org.uk/make-a-complaint/">https://ico.org.uk/make-a-complaint/</a>]