

## FULLBEAUTY Brands Privacy Policy

Last Updated: January 1, 2026

The FULLBEAUTY Brands family of brands, which includes Woman Within<sup>®</sup>, Jessica London<sup>®</sup>, Roaman's<sup>®</sup>, SwimsuitsForAll<sup>®</sup>, FullBeauty<sup>®</sup>, Ellos<sup>®</sup>, KingSize<sup>®</sup>, BrylaneHome<sup>®</sup>, Catherines<sup>®</sup>, FullBeauty Outlet<sup>®</sup>, OneStopPlus<sup>®</sup>, Intimates For All<sup>®</sup>, Shoes For All<sup>®</sup>, June & Vie<sup>®</sup>, Active For All<sup>®</sup>, Eloquii<sup>®</sup>, CUUP<sup>®</sup>, Dia Shop<sup>™</sup>, Dia & Co.<sup>®</sup>, Avenue<sup>®</sup>, Joe Browns<sup>®</sup> and any other brands owned or operated by FULLBEAUTY Brands, Inc., or any of its affiliates from time to time (collectively, "FULLBEAUTY Brands"), understands that you care about how we collect, use, and share information when you interact with our websites, mobile application, social media sites and handles, email and online services (collectively our "Services") and we value the trust you place in us. This Privacy Policy explains:

- The types of information we collect through our Services.
- How we use that information.
- The types of information we may share with others and under what circumstances.
- How we secure, store and retain your information.
- The choices you have regarding our collection, use and sharing practices.
- Details regarding our use of third-party cookies and other tracking technologies.

We also include specific disclosures for residents of California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Nevada, Oregon, Rhode Island, Tennessee, Texas, Utah and Virginia.

This Policy applies to all of the FULLBEAUTY Brands Services, including the websites and our mobile application on which this Policy appears. It does not apply to non-FULLBEAUTY Brands websites or mobile applications that may link to the Services or be linked to or from the Services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

### Information We Collect

In order to better provide you with our Services, we may collect information as follows:

- Directly from you, when you provide information to us, including through surveys we conduct, or interact with one of our brands or Services:
  - *Contact information*, such as your name, mailing address, e-mail address and phone number, and any other information you choose to include when you communicate with us via e-mail, mail, phone, chat services or other channels. We record telephone conversations and create records of chats with our

customer service center for record-keeping, training, and quality assurance purposes.

- *Profile information*, such as a username and password, your name, mailing address, e-mail address, phone number, product, size and style preferences and usage and subscription preferences, which may include signing up to some of our Services or communications from us.
- *Transactional information*, including goods (including gift cards) you browse or purchase, rewards points, including in connection with our mobile application (where applicable), and shopping history if you make purchases or returns through the Services. For international shipments, we may be required to collect special import identification numbers for customs purposes.
- *Information included in product reviews*, including photographs if you choose to submit them, and other information you provide in response to questions we or our service providers may send you.
- *Referrals and social networking site information*, such as when you refer your friends through our referral service (in connection with which we collect names and contact information) or any social media account information you provide when you authorize us to access your account(s) on such social networking site(s).
- *Professional or employment-related information*, that we receive when you apply for a position with us.
- Automatically from you, when you utilize or interact with our Services:
  - *Device information* and online user activity when you utilize our technology platforms, as described in the next section.
  - *Website information* and online user activity when you visit and interact with our websites or social media sites, as described in the next section.
- From third parties:
  - Information about your interests, contact information, demographic information, and marketing inferences, from third party sources that provide consumer data, social networks and other sources of publicly available data.
  - Information about the marketing and advertisements you have seen or clicked on, from online advertising companies.

Some of this information may be collected by external parties on our behalf. For example, we use a payment processor when you engage in a transaction on our Services. We do not collect or store payment card information.

If you provide us with information regarding another individual, you represent that you have that person's consent to give us his or her information and to permit us to use the information in accordance with this policy.

### **Online User Activity, Cookies and Information Collected by Other Automated Means**

When you interact with the Services, certain information about your use of our Services is automatically collected by us or our third-party services providers. Such information includes:

- Usage details and clickstream data of your interactions with our Services (including the timing, frequency and pattern of Service use), the resources that you access (including your use of a chat box), pages viewed, how much time you spent on a page, and how you reached our site. We may also log the details of your visits to our site and information generated in the course of using our site, such as mouse movements, clicks, page visits, text/searches entered, how long you spent on a page, browsing history and other details of your actions on our site.
- Details regarding the device you use to access our Services, including, but not limited to, your IP address, device and online identifiers (e.g., IDFA and IDFA), mobile and web network activity, event and related information (such as MAC address, IP address, cookie IDs, etc., operating system, internet service provider and browser type and crash data).
- Location information (e.g., the physical location of your device by, for example, using satellite, cell phone tower or WiFi signals) where you choose to provide our website or mobile application with access to information about your device's location. We also collect your IP address, which may allow us to determine your location, including to determine your mailing address.
- Information about how you interact with our ads and newsletters, including whether you open or click links in any correspondence.

Much of this information is collected through tags, cookies, web beacons, and other tracking technologies, which may be operated by our partners who assist us in collecting information about usage of the Services, serving ads, or providing other services to you. In particular, cookies are pieces of information stored directly on the computer that you are using, and allow us and our third-party service providers to collect information such as browser type, time spent on our websites, pages visited, language preferences and other traffic data. We and our service providers use the information collected from cookies for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience. We also use cookie data to gather statistical information about use of our Services in order to continually improve their design and functionality, understand how they are used, and assist us with resolving questions regarding them. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and to serve such advertisements to you. We may also use cookies or other technologies in online advertising to track responses to our ads.

Some cookies are our own but we also work with third parties who set their cookies from our website pages and help us run our websites (these are called third-party cookies) and who may

share the information collected with our third-party service and marketing partners for enhancing and improving the Services, including our Websites, chatbot or other online services, and/or for our marketing or promotional purposes. For example:

- We use Adobe Analytics to collect usage details. You can learn more about privacy and Adobe Analytics by going to <https://www.adobe.com/privacy.html>, and opt out of collection of your data by using the Adobe Analytics Opt-out Browser Add-on.
- We use Google Analytics, which uses cookies and similar technologies to collect and analyze information about the use of our Services and to report on activities and trends. This service may also collect information regarding your use of other websites, apps, and online resources. You can learn about Google's practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/), and opt-out of them by downloading the Google Analytics opt-out browser add-on, <https://tools.google.com/dlpage/gaoptout>. Additionally, we use Google's invisible reCAPTCHA application on our websites in order to protect against spam and other automated abuse. The reCAPTCHA tool may make use of cookies, as well as other information like IP address, date, time, language, screen size and resolution and mouse movements, while on the page. The use of the reCAPTCHA service and the treatment of any information collected through the service are subject to Google's applicable privacy policy, available at <https://policies.google.com/privacy>, and Google's terms of service, available at <https://policies.google.com/terms?hl=en>.
- We use Google Ads and Facebook Pixel to serve ads following your visit to our Services and track your interactions with those ads. You can opt out of personalized advertising through Google's Ad Settings at <https://adssettings.google.com/> and Facebook's Ad Settings at <https://www.facebook.com/settings>.

We may also use cookies set by other third-party services.

You may be able to opt out of tracking by cookies or control how information collected by cookies is used via a number of means, as described below.

## **How We Use Your Information**

We may use the information we collect from you for the following purposes:

- To provide you with our Services, including to take steps to transact a sale or for services, process payments/assist with providing financing, fulfill orders, and send service communications, including in response to questions or other communications you submit via our chatbot.
- To enable additional features on our Services and to provide you with a personalized service, such as to provide you with styling services in connection with the Dia Box, and to provide technical support.
- To notify you regarding products, services, and promotions that may be of interest to you, including sending you electronic and paper communications such as updates on orders in

process and returns, to remind you about items left in your online shopping cart or to tell you that you need to take action to keep your account active.

- To operate our customer perks and rewards programs, including to verify your identity and enroll you when requested and to provide you with updates regarding your rewards account.
- To use photographs or reviews you have uploaded and comments you have posted for marketing purposes.
- To create custom audiences on social media sites.
- To provide you with the best service and improve and grow our business, including understanding our customer base and purchasing trends to improve the selection of products or develop new features, and understanding the effectiveness of our marketing, and tailoring advertising to you.
- To evaluate, recruit, and hire personnel.

To detect, investigate, and prevent security incidents or activities that may violate our policies or be fraudulent or illegal, and to comply with legal requirements regarding the provision of products and services.

- To undertake quality/safety control or product improvement activities, and to secure the access to, and use of, our facilities, equipment, systems, networks, applications, and infrastructure.
- To respond when required by subpoena, warrant, or other legal process.

We may also use, combine, or share information in a de-identified or aggregated manner for many purposes such as research, traffic accounting, analysis, modeling, marketing, and advertising, as well as improvement of our Services.

We may also use publicly available information about you obtained from third parties for the purpose of understanding our customer base.

### **Our Sharing of Your Personal Information**

We may share information across our FULLBEAUTY Brands family of brands. We may also share your information as follows:

- *Service Providers:* We may share your information with vendors as needed to perform functions on our behalf such as: website hosting, website, mobile application, software and data storage, content management, customer communications, chatbot functionality, database management, technical integration, marketing automation, analytics or enhancement, website and mobile application optimization, conducting customer surveys, shipping, payment processing or to perform other administrative functions (including through storage of chat transcripts and provision of tools that enable us to analyze your interactions on our websites).

- Please be advised that, when you participate in our chatbot features on our websites, we and our third-party service vendors who assist us with such features can record and use your communications and the information you provide to assist you during the chat session, to provide customer service, improve our products and services, and for marketing and advertising purposes.
- *Analytics Partners:* We partner with analytics providers, who collect information via tracking technologies on our websites and mobile application to assist us with measuring visits and traffic on our websites and mobile application so we can measure and improve the performance of the sites.
- *Third parties involved in advertising and marketing:* We share information with third parties who assist us in serving advertising regarding the Services, who may also use the information for commercial purposes. These third parties may include parties who use tracking technologies on our Services to collect or receive information from the Services and elsewhere on the internet and use that information to provide measurement services and target ads.
- *Similar Companies and Cooperatives:* We may share your mailing address directly with other companies who may sell services of interest to you, as well as with data cooperatives, who consolidate information from multiple companies and provide such companies with customer targeting services.
- *Social Media Platforms:* Where you choose to interact with us through social media, your interaction with these programs typically allows the third party to collect some information about you through digital cookies they place on your device and other tracking mechanisms. In some cases, the third party may recognize you through its digital cookies even when you do not interact with their application. Please visit the third parties' respective privacy policies to better understand their data collection practices and controls they make available to you.
- *Branded Private Label Credit Card Accounts:* If you hold a branded private label credit card, we share information with the bank that issues branded private label credit card accounts, Bread Financial (formerly Comenity Bank). Shared information includes the date of the order, the type of payment, the amount of the order, and similar items, and may also include your name, address or other contact information. Bread Financial's Privacy Policy is available [here \(https://www.breadfinancial.com/en/legal/privacy.html\)](https://www.breadfinancial.com/en/legal/privacy.html).
- *Change of Ownership or Corporate Organization:* We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, financing transaction, investment or bankruptcy, receivership, sale of assets, dissolution, or other similar event. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Policy.

- *Other:* We may also disclose information about you: (i) if we are required to do so by law or legal process; (ii) when we believe disclosure is necessary to prevent harm or financial loss; (iii) in connection with an investigation of suspected or actual fraudulent or illegal activity; or (iv) under exigent circumstances to protect the personal safety of our staff, users, or the public.

## **How We Secure and Store the Information We Collect from or About You**

We endeavor to maintain reasonable administrative, technical, and physical safeguards to protect the personal information we collect through the Services against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf and cannot guarantee that this information will not be accessed, disclosed, altered, or destroyed.

If you use our Services outside of the United States, you understand that we may collect, process, and store your personal information in the United States and other countries. The laws in the U.S. regarding personal information may be different from the laws of your state or country. Any such transfers will comply with safeguards as required by relevant law. By using the Services, you consent to the collection, international transfer, storage, and processing of your data.

## **Retention of Your Information**

We will retain your personal information for as long as is necessary to complete the purposes for which it was collected, or as may be required by law.

California law requires us to provide information regarding the criteria we use to determine the length of time for which we retain personal information. We utilize the following criteria to determine the length of time for which we retain information:

- The business purposes for which the information is used, and the length of time for which the information is required to achieve those purposes (including the length of time we have an ongoing relationship with you);
- Whether we are required to retain the information type in order to comply with legal obligations or contractual commitments, to defend against potential legal claims, or as otherwise necessary to investigate theft or other activities potentially in violation of our policies and procedures applicable to you or against the law, to ensure a secure online environment, or to protect health and safety;
- The privacy impact of ongoing retention on the consumer; and
- The manner in which information is maintained and flows through our systems, and how best to manage the lifecycle of information in light of the volume and complexity of the systems in our infrastructure.

Individual pieces of personal information may exist in different systems that are used for different business or legal purposes. A different maximum retention period may apply to each use case of

the information. Certain individual pieces of information may also be stored in combination with other individual pieces of information, and the maximum retention period may be determined by the purpose for which that information set is used.

## Your Options

- *Account Information:* Please visit the My Account page to update your contact information and payment method.
- *Email Marketing:* If at any time you would like to unsubscribe from receiving future emails, you can do so in any of the following ways:
  - By clicking the unsubscribe link at the bottom of any email bulletin.
  - Email us at [unsubscribe@fbbrands.com](mailto:unsubscribe@fbbrands.com) (or for Dia & Co. customers you can email us at [support@dia.com](mailto:support@dia.com)).
  - By going to the relevant FULLBEAUTY Brands website and clicking on the “Contact Us” link at the bottom of the web page and making your request from the available form or by calling our Customer Service team at the phone number provided.
  - By going to the relevant FULLBEAUTY Brands My Account page, entering your email and password, and indicating your email preferences.

Upon receiving your request, we will promptly remove you from all email correspondence.

- *Direct Mail Marketing:* If at any time you would like to be removed from a paper catalog mailing list, you can do so in any of the following ways:
  - By going to the relevant FULLBEAUTY Brands website and clicking on the “Contact Us” link at the bottom of the web page and making your request from the available form or calling our Customer Service team at the phone number provided. Please make sure to provide us with your exact name and address as it appears on the mailing label from your catalog so that we can identify you correctly.
  - By going to the relevant FULLBEAUTY Brands My Account page, entering your email and password to access your account, and indicate your catalog preferences.
  - By going to the relevant FULLBEAUTY Brands website and clicking on the “Catalog Preferences” link at the bottom of the web page and indicate your catalog preferences.

We will make every effort to implement any choice you make as soon as possible, but you should allow up to three months for mailing change requests to be fully implemented. Any mailings that you may receive during this time do not reflect your subscription status, and we ask that you please disregard them.



- *Online Activity Tracking and Interest-Based Advertising:* You have several options to either prevent our collection of information regarding your online or device activity, or prevent third parties from using such information from being used for interest-based advertisements:
- You can opt out or set preferences regarding cookies when a device you utilize visits the Services by visiting the [Your Privacy Choices](https://submit-irm.trustarc.com/services/validation/7205e9e3-8e85-4a64-aeaf-944e40dcd0ce) (see <https://submit-irm.trustarc.com/services/validation/7205e9e3-8e85-4a64-aeaf-944e40dcd0ce>) page. Please note that you will need to set preferences on each device you use to visit the Services and separately as to each of our brands.
- You can also modify your browser settings to disable or reject cookies across the internet; but if you do so, some features of our Services may not function properly or be available. If you are visiting the Services from a mobile device, the operating system of the device may offer you options regarding how the device collects and uses your information for interest-based advertising. Click [here](https://thenai.org/how-to-opt-out/advertising-privacy-settings-on-mobile-devices/) (see <https://thenai.org/how-to-opt-out/advertising-privacy-settings-on-mobile-devices/>) for more information.
- Please note that we do not respond to “Do Not Track” signals sent from browsers.
- *Disclosure to Third Parties for Marketing Purposes:* You may opt-out of disclosure of your information to third parties who offer products and services you may be interested in by submitting a request via this [form](https://submit-irm.trustarc.com/services/validation/7205e9e3-8e85-4a64-aeaf-944e40dcd0ce) (see <https://submit-irm.trustarc.com/services/validation/7205e9e3-8e85-4a64-aeaf-944e40dcd0ce>).
- *SMS Marketing:* Consent to receive automated marketing text messages is not a condition of any purchase. You can opt-out of receiving commercial text messages via by responding to any of our text messages with any of the following replies: STOP, END, CANCEL, UNSUBSCRIBE, or QUIT. If you opt out, we may still send you messages regarding the status of your orders and other service-related communications.
- *Social Media:* Please click on the “un-follow,” “un-friend,” “unsubscribe,” or similar button and follow instructions provided by the relevant social media platform, as each social media platform has its own opt-out process, and we do not control those processes.
- *Collection and Disclosure of Information by Consumer Data Providers:* When you opt out of our use or sharing of your information, it does not opt you out of the use or sharing by other companies, including “data brokers” who may provide us with information.

## **Children’s Information**

We do not knowingly collect personal information from children under 16 years old. If you are a parent and believe that your child under the age of 16 has accessed and/or used our Services or

otherwise provided personal information to us, please contact us at the mailing address at the end of this Privacy Policy, and we will work to delete that account and any such personal information.

### **Changes to This Policy**

We may make changes to this Policy from time to time. We will post any changes, and such changes will become effective when they are posted. Your continued use of our Services following the posting of any changes will mean you accept those changes.

### **Contacting Us**

For questions about our privacy practices, contact us at:

FULLBEAUTY Brands, Inc.  
One New York Plaza  
New York, NY 10004  
Attn: Privacy Officer  
Email: [PrivacyOfficer@fbbrands.com](mailto:PrivacyOfficer@fbbrands.com)

To the extent applicable privacy laws provide you with certain rights regarding our processing of your data, please see the instructions below for the appropriate method to submit such requests. Please review the relevant instructions carefully, as privacy rights requests made outside of the designated channels may delay our ability to promptly respond to your requests.

### **Additional Information for California Residents**

#### Your California Privacy Rights

California's "Shine the Light" law permits customers in California to request certain details about how certain types of their information are shared with third parties for those third parties' own direct marketing purposes. If you are a California resident and would like to make such a request, please email [PrivacyOfficer@fbbrands.com](mailto:PrivacyOfficer@fbbrands.com) or write to us at FULLBEAUTY Brands, Inc., One New York Plaza, New York, NY 10004, Attn: Privacy Officer.

#### California Notice at Collection

California law provides California residents with rights to receive certain disclosures regarding the collection, use, and sharing of "Personal Information," rights to access, delete, correct certain Personal Information we collect about them, restrict us from "selling" or "sharing" certain Personal Information, and limit our use of Sensitive Personal Information, as defined by the law and described in the categories below. These rights apply to all residents of CA, regardless of whether you are a customer or business contact. As a California resident, you have a right not to receive discriminatory treatment for the exercise of your privacy rights.

#### Collection, Use, and Retention of Personal Information

You have the right under the California Consumer Privacy Act ("CCPA") to receive notice of the categories of Personal Information we collect, the purposes for which those categories of Personal

Information will be used, and the criteria we use to determine the length of time for which we will retain the Personal Information.

The following chart describes our practices with regard to the collection, use, and retention of your personal information. The categories we use to describe the information are those listed in the CCPA. Certain personal information may fall into multiple categories, and in some circumstances, how we use and how long we keep the information within each category will vary.

Category	Required Information
Personal Identifiers	<p><u>Examples of what we collect:</u> Name; email address; phone number; contact address; username; social media handle and basic account information; unique identifiers (such as those assigned in cookies); photographs you submit.</p> <p><u>Sources:</u> Directly and automatically from you; Affiliated brands; Third Parties, including via cookie or other tracking technologies.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Certain personal details are maintained throughout the customer relationship in order to provide the Services. When you are no longer a customer, we may still need this information for a period of time for business and legal requirements, such as to calculate taxes and protect against fraud.</p>
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	<p><u>Examples of what we collect:</u> Address; telephone number; tokenized payment card information through processors; physical characteristics or descriptions.</p> <p><u>Sources:</u> Directly from you; Affiliated Brands; Third Parties.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Certain personal details are maintained throughout the customer relationship in order to provide the Services. When you are no longer a customer, we may still need this information for a period of time for business and legal requirements, such as to calculate taxes and protect against fraud.</p>

Protected classification characteristics under California or federal law	<p><u>Examples of what we collect:</u> Gender; age; marital status.</p> <p><u>Sources:</u> Directly from you; Third Parties.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Demographic information is used to inform the delivery of our Services throughout the customer relationship, including relevant advertising.</p>
Commercial information	<p><u>Examples of what we collect:</u> Transaction information (including gift card-related information); billing records; payment records; return records, order history; rewards points, including in connection with our mobile application (where applicable); information about your interactions with us.</p> <p><u>Sources:</u> Directly and automatically from you; Affiliated brands; Third Parties, including via cookie or other tracking technologies.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> The law requires us to maintain purchase records for a period of time, which varies by state.</p>
Biometric information	Not collected.
Internet or other similar network activity	<p><u>Examples of what we collect:</u> Unique numerical identifier; tag, cookie, web beacon or tracking pixel information; device ID; browsing history; search history; IP address; internet service provider, mobile and web network activity; interaction with a website; or interaction with advertisement.</p> <p><u>Sources:</u> Automatically from you; Third parties, including via cookie or other tracking technologies.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Internet or other similar network activity is typically deleted at regular intervals when the information is no longer necessary for the purpose for which it was collected.</p>

Geolocation data	We collect coarse information (e.g., IP address as noted above but do not collect precise geolocation).
Professional or employment related information	Not collected.
Education information	Not collected.
Audio, electronic, visual, thermal, olfactory, or similar information	<p><u>Examples of what we collect:</u> Call recordings (e.g., customer service calls); photographs in connection with product reviews.</p> <p><u>Sources:</u> Directly from you; Third parties.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Call recordings are deleted at regular intervals when the information is no longer necessary for the purposes for which it is collected.</p>
Inferences drawn from other personal information	<p><u>Examples of what we collect:</u> Interests; preferences (e.g., size and style preferences).</p> <p><u>Sources:</u> Created about you based on information you provide and information we receive from Third Parties.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> The retention period for this type of personal information will vary depending on the nature of the underlying information from which the inference is created.</p>
Sensitive information	<p><u>Examples of what we collect:</u> Password or credentials allowing access to an account.</p> <p><u>Sources:</u> Directly from you.</p>

	<p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Certain personal details about you are maintained throughout the life of the customer relationship in order to provide the Services.</p>
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### Sale, Sharing, and Other Disclosure of Personal Information

California law also requires us to provide you with information regarding the parties to whom we “sell” or “share” your information, and the parties to whom we disclose your information for a business purpose. Under the CCPA, a business “sells” personal information when it discloses personal information to a third party for monetary or other benefit, and a business “shares” personal information when it discloses personal information to a third party for cross-context behavioral advertising. A company may be considered a third party either because the purpose for its disclosure of personal information is not for an enumerated business purpose under California law, or because its contract does not restrict it from using personal information for other purposes.

We sell or share your information as follows:

- Identifiers: affiliated brands; similar companies; analytics partners; advertising and marketing partners.
- Personal information categories listed in the California Customer Records statute: affiliated brands; similar companies; analytics partners; advertising and marketing partners.
- Characteristics of Protected Classifications under California or federal law: affiliated brands; third party business partners.
- Commercial Information: to affiliated brands, analytics partners; advertising and marketing partners.
- Internet or Electronic Network Activity Information: affiliated brands; analytics partners; advertising and marketing partners.
- Inferences: to affiliated brands, analytics partners; advertising and marketing partners.
- Sensitive Personal Information: to affiliated brands, analytics partners; advertising and marketing partners.

Please note that, as we do not collect personal information from children under 16 years old, we do not knowingly sell or share personal information (including sensitive personal information) of individuals younger than 16 years of age.

Any category of personal information listed above may be disclosed for a business purpose to service providers and contractors, which are companies or individuals that we engage to conduct

activities on our behalf. Service providers and contractors are restricted from using personal information for any purpose not related to our engagement.

We may disclose personal information to companies that also provide products and services to our customers for their own marketing purposes and in additional, more limited circumstances, as described above (see “Our Sharing of Your Personal Information” section above).

### Right to Opt Out of Sale and Sharing

You have the right to opt out of the sale or sharing of your personal information by us to third parties. To exercise your right to opt out of the sale or sharing of your information, visit our [Your Privacy Choices](https://submit-irm.trustarc.com/services/validation/7205e9e3-8e85-4a64-aeaf-944e40dcd0ce) (see <https://submit-irm.trustarc.com/services/validation/7205e9e3-8e85-4a64-aeaf-944e40dcd0ce>) page.

Please note that your right to opt out does not apply to our sharing of personal information with service providers, as described above.

If your browser offers you the ability to use the [Global Privacy Control](https://globalprivacycontrol.org/) (see <https://globalprivacycontrol.org/>) (GPC) to communicate your privacy preferences to us, we honor such signals for residents of California. To download and use a browser supporting the GPC browser signal, click [here](https://globalprivacycontrol.org/orgs) (see <https://globalprivacycontrol.org/orgs>). If you choose to use the GPC, you will need to turn it on for each supported browser or browser extension you use.

### Right to Limit Use of Sensitive Personal Information

You have the right to request that we limit use of your sensitive personal information to certain purposes allowed by law. At this time, we do not use sensitive personal information in any situations where you may have the legal right to opt-out.

### Right to Request Access to, Correction, and Deletion of Personal Information

You have the right to request access to personal information collected about you and information regarding the source of that information, the purposes for which we collect it, and the third parties and service providers with whom we share it. You also have the right to request we correct inaccurate personal information and to request, in certain circumstances, that we delete any personal information that we have collected directly from you.

You may submit a request to exercise your rights to know/access, correct or delete your Personal Information by visiting our [Your Privacy Choices](https://submit-irm.trustarc.com/services/validation/7205e9e3-8e85-4a64-aeaf-944e40dcd0ce) (see <https://submit-irm.trustarc.com/services/validation/7205e9e3-8e85-4a64-aeaf-944e40dcd0ce>) page, or by calling us at 1-800-781-9168. You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf through these means.

In order to process your request to know/access, correct or delete Personal Information we

collect, disclose, or sell, we may ask to verify your request. We do this by asking you to provide personal identifiers we can match against information we may have collected from you previously and confirm your request using the email account stated in the request.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response. In the event we deny your privacy rights request, you have the right to appeal our decision by emailing us at [PrivacyOfficer@fbbrands.com](mailto:PrivacyOfficer@fbbrands.com).

#### Right to Be Free from Discriminatory Treatment

We will not discriminate or retaliate against you for exercising any of your rights under California law.

#### Right to Information Regarding Participation in Data Sharing for Financial Incentives

From time to time, we may offer incentives or discounts for consumers to sign up for our electronic marketing communications, including in connection with our various rewards programs. Participation in these incentives is voluntary, and you may opt out of receiving these electronic communications by contacting us as indicated in the Your Options section above.

FULLBEAUTY Brands does not generally assign monetary or other value to consumers' Personal Information, and our promotional activity changes continually. To the extent California law requires that a value be assigned to such programs, or the price or service differences they involve, FULLBEAUTY Brands values the Personal Information as being equal to the value of the discounts or other financial incentives provided in each such program. Such calculation is based upon a practical and good-faith effort to assess, on an aggregate basis for all collected information:

(1) the data elements collected (e.g., email address), (2) the use of such information by FULLBEAUTY Brands in connection with its marketing activities, (3) the range of discounts provided (which can depend on each consumer's purchases under such offers), (4) the number of consumers enrolled in respective programs, and (5) the product or service to which the benefits (such as price difference) applies. These values can change over time.

#### **Additional Information for Residents of Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia**

If you are a resident of any of the following states, the law of your state provides you with rights to access, delete, and correct certain "Personal Data" we collect about you, as well as to restrict the use of that Personal Data for targeted advertising, restrict the "sale" of that Personal Data, and control our use of Personal Data considered sensitive:

- Colorado
- Connecticut
- Delaware



- Indiana
- Iowa
- Kentucky
- Maryland
- Minnesota
- Montana
- Nebraska
- New Hampshire
- New Jersey
- Oregon
- Rhode Island
- Tennessee
- Texas
- Utah
- Virginia

You or your authorized agent (to the extent permitted or required by applicable law) may submit a request to exercise your access, deletion, and correction rights by visiting our [Your Privacy Choices](https://submit-irm.trustarc.com/services/validation/7205e9e3-8e85-4a64-aeaf-944e40dcd0ce) (see <https://submit-irm.trustarc.com/services/validation/7205e9e3-8e85-4a64-aeaf-944e40dcd0ce>) page, or by calling us at 1-800-781-9168.

You or your authorized agent (to the extent permitted or required by applicable law) may also submit a request to opt out of targeted advertising and the sale or sharing of Personal Data by visiting our [Your Privacy Choices](https://submit-irm.trustarc.com/services/validation/7205e9e3-8e85-4a64-aeaf-944e40dcd0ce) (see <https://submit-irm.trustarc.com/services/validation/7205e9e3-8e85-4a64-aeaf-944e40dcd0ce>) page.

In the event we deny your privacy rights request, you have the right to appeal our decision by emailing us at [PrivacyOfficer@fbbrands.com](mailto:PrivacyOfficer@fbbrands.com).

Residents of Colorado, Connecticut, Delaware, Indiana, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas and Virginia also have the right to opt-out of automated processing in certain instances where such processing would produce legal or other similarly significant effects. At this time, we do not use Personal Data to make automated decisions about you in any situations where you may have a legal right to opt-out.

For Residents of Colorado, Delaware, Kentucky, Maryland, Minnesota, Nebraska, New Hampshire, New Jersey, and Rhode Island. If your browser offers you the ability to use the [Global Privacy Control](https://globalprivacycontrol.org/) (see <https://globalprivacycontrol.org/>) (GPC) to communicate your privacy preferences to us, we honor such signals. To download and use a browser supporting the GPC browser signal, click here: <https://globalprivacycontrol.org/orgs>. If you choose to use the GPC, you will need to turn it on for each supported browser or browser extension you use.

For residents of Rhode Island, you have the right to request a list of all third parties to whom we sell personally identifiable information as defined under the Rhode Island

privacy law. You may make such request by emailing us at [PrivacyOfficer@fbbrands.com](mailto:PrivacyOfficer@fbbrands.com).

**Additional Information for Nevada Residents**

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to third parties who will sell or license their information to others. If you are a Nevada resident and would like to make such a request, please email [PrivacyOfficer@fbbrands.com](mailto:PrivacyOfficer@fbbrands.com) and include "Nevada" on the "re:" line for our ease of reference.