

# Privacy Policy

## **Twila Kaye International, LLC Privacy Policy**

*This Privacy Policy was last revised on June 6, 2014.*

### **1. How your Privacy is Protected**

Twila Kaye International, LLC ("TKI" "us" or "we") are dedicated to protecting your privacy and handling any personally identifiable information we obtain from you with care and respect.

As used in this Privacy Policy, TKI includes all of its subsidiary and affiliated entities. TKI is referred to in this Privacy Policy as "we," "us," "our," and "ourselves." The term web site(s) or site(s) includes TwilaKaye.com as well as any other web sites operated by TKI.

This Privacy Policy sets forth our policy with respect to information, including personally identifiable information that is collected from users of and/or visitors to TwilaKaye.com. When this Privacy Policy uses the term "personally identifiable information," we mean information that identifies a particular individual, such as the individual's name, address, e-mail, and phone number. Personally identifiable information is also referred to in this Privacy Policy as "personal information."

Please note that any text, video, image, or other content posted by you or a third party onto any interactive area of TwilaKaye.com becomes published content and is not considered personally identifiable information subject to this Privacy Policy.

TKI uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your personal information. We cannot, however, ensure or warrant the security of any information you transmit to TKI and you do so at your own risk.

### **2. Information You Provide to Us**

Typically the personally identifiable information we receive comes directly from users like you who are interested in obtaining various products and services from us or from third parties. In general, this information includes the user's login name, real name, postal address, e-mail address, and telephone number.

We may also collect other types of information such as types of products or services you are interested in. We collect personal information when you register for a customer account, submit an order, contact us with inquiries, respond to one of our surveys, log on, or visit our web sites, including when you participate in activities on our web sites, such as any promotional offers.

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The personally identifiable information we may collect includes without limitation your name, address, email address and other personally identifiable information. In some cases we may collect your PayPal information (e.g. your PayPal email address) or your credit card information (e.g., your credit card number and expiration date, billing address, etc.), some of which may constitute personally identifiable information, to secure certain payments.

### **3. Information Collected Through Technology**

We collect information through technology to make our sites more interesting and useful. For instance, when you come to one of our sites, your IP address is collected. An IP address is often associated with the network through which you enter the Internet, like your ISP or your company. At times, we also use IP addresses to collect information regarding the frequency with which our users visit various parts of our sites. We may also use your IP Address to help diagnose problems with our servers, and to administer our web sites.

When you view our web sites we may store a small amount of information on your computer. This information will be in the form of a "cookie" or similar file. Cookies are small files stored on your computer, not on our site. We use cookies in our interactive website areas, to deliver content specific to your interests, and so you are not required to reenter your account data every time you connect to the site or move to a new web page. Through your web browser you can choose to have your computer warn you each time a cookie is being set, or you can choose to delete or turn off all cookies at any time. Each browser is a little different, so look at your browser's Help menu to learn the correct way to modify your cookie settings.

Our web sites may also use a variety of technical methods for tracking purposes, such as JavaScript snippets or pixel tags. We may also use these technical methods to analyze the traffic patterns on our web sites, such as the frequency with which our users visit various parts of our web sites. We may directly collect or use third-party analytics tools to help us measure traffic and usage trends for the site. These tools collect information sent by your browser or mobile device as part of a web page request, including the web pages you visit, your browser add-ons, your browser's width and height, and other information that assists us in improving the site.

When you access the Site by or through a mobile device, we may access, collect, monitor and/or remotely store "location data," which may include GPS coordinates (e.g. latitude and/or longitude) or similar information regarding your location.

When you access the Site by or through any device, we may access, collect, monitor and/or remotely store one or more "device identifiers," such as a universally unique identifier from a mobile phone or tablet. Device identifiers are small data files or similar data structures stored on or associated with your mobile device, which uniquely identify your mobile device.

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Advertisements may be managed and placed on our web sites by third parties. Third-party advertisers who place advertisements on our web sites may also use cookies, JavaScript snippets and pixel tags to collect non-personally identifiable information when you click on or move your cursor over one of their banner advertisements. Once you've clicked on an advertisement and have left our web sites, our Privacy Policy no longer applies and you must read the privacy policy of the advertiser to see how your personal information will be handled on their site.

We currently do not participate in any "Do Not Track" frameworks that would allow us to respond to signals or other mechanisms from you regarding the collection of your personally identifiable information.

## **4. Information Collected Through Third Parties**

We may also collect information from third parties, for example our payment processors as the result of payments you make to TKI including, but not limited to, your name, billing address, email address, and phone number.

We may also collect information from third party websites such as Facebook and Twitter when you interact with our site using those services. This information may include, the user identification associated with your account, an access token, any information you have made public in connection with that third party, and any information that you have permitted the third party to share with us.

## **5. Use of Personally Identifiable Information**

We may use your personally identifiable information in many ways, including helping you find clothing items, sending you promotional materials, and sharing your information with third parties so that these third parties can send you promotional materials. We may also supplement personally identifiable information that we have collected directly from our users with other information that we obtain from third party partners. We may also share your personal information with companies we have a relationship with that offer products and/or services.

In addition, we may also share your information when you participate in certain activities on our sites that are sponsored by third parties such as making specific requests for business information or participating in promotions or contests sponsored in whole or in part by a third party.

Finally, sometimes we hire companies to help deliver products or services, like a company that provides payment processing or product delivery. In those instances, there is a need to share your information with these companies.

We may also take your personally identifiable information and make it non-personally identifiable, either by combining it with information about other individuals, or by removing characteristics (such as your name) that make the information personally

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identifiable to you. There are no restrictions under this Privacy Policy upon our right to aggregate or de-personalize your personal information, and we may use and/or share the resulting non-personally identifiable information with third parties in any way.

We may store personally identifiable information itself or such information may be included in databases owned and maintained by our affiliates, agents or service providers. We take what we believe to be reasonable steps to protect the personally identifiable information from loss, misuse, unauthorized access, inadvertent disclosure, alteration, and destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from TwilaKaye.com may not be secure. Therefore, you should take special care in deciding what information you send to us via e-mail. Please keep this in mind when disclosing any personally identifiable information via the Internet.

We may also share certain information such as your location, browser and cookie data and other data relating to your use of our Site with our business partners to deliver advertisements ("ads") that may be of interest to you. This Privacy Policy does not apply to, and we cannot control the activities of, third-party advertisers. Please consult the respective privacy policies of such advertisers or contact such advertisers for more information.

## **6. International Privacy Laws.**

If you are visiting our website or using one of our software applications from outside the United States, please be aware that you are sending information (including personally identifiable information) to the United States where our servers are located. We will hold and process your personally identifiable information in accordance with privacy laws in the United States and this Privacy Policy. Please note that privacy laws in the United States may not be the same as, and in some cases may be less protective than, the privacy laws in your country.

## **7. Purchase or Sale of Businesses**

From time to time we may purchase a business or one or more of our businesses may be sold and your personally identifiable information may be transferred as a part of the purchase or sale. We may also, sell assign, or otherwise transfer such information in the regular course of business. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your personal information is treated, transferred, or used.

## **8. Additional Disclosures Required By Law**

We will disclose personal information when we believe in good faith that such disclosures are required by law, including, for example, to comply with a court order or subpoena; to enforce our Terms of Use; enforce contest, sweepstakes, promotions, and/or

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game rules; to protect your safety or security; and/or, protect the safety and security of our web sites, us, and/or third parties, including the safety and security of property that belongs to us or third parties.

## **9. Children's Information**

This site is not directed toward persons under eighteen (18) years of age. TKI does not knowingly collect personally identifiable information from persons under eighteen (18) years of age.

## **10. Applicability**

This Privacy Policy applies to personally identifiable information collected on the web sites where this Privacy Policy is posted and does not apply to any other information collected by TKI through any other means.

## **11. Changes and Updates**

This Privacy Policy may be revised periodically and this will be reflected by the "last revised" date above. Your use of TwilaKaye.com constitutes your agreement to the Privacy Policy in effect.