



**Effective May 1, 2021**

This Privacy Policy covers Couture Business Gifting (“CBG,” “we,” “us,” “our”) policies on the collection, use, and disclosure of personally identifiable and other personal information (as defined by applicable law, including, but not limited to, the California Consumer Privacy Act of 2018, Civil Code sections 1798.100 et seq (“CCPA”)) (collectively referred to as “Personal Information”) in connection with your use or access of the [www.couturegifting.com](http://www.couturegifting.com) website (the “Site”).

By checking the “I consent to the Privacy Policy” box and/or accessing the Site, and subject to your opt-in/opt-out preferences, you consent to the collection, use and disclosure practices identified in this Privacy Policy.

## 1. What Information Is Collected by CBG And How Is It Used?

### Categories of Personal Information.

**User Account:** Users may create an account by providing their name, email address and password. Registration is optional and users may access the Site as a guest at any time.

**Purchases:** When you purchase products on the Site, CBG will collect shipment and payment information as follows:

**Shipment:** Users will be required to provide information, including names, emails (for electronic delivery) and addresses (for physical delivery) of products purchased on the Site. Phone numbers and email addresses may also be requested in the event CBG or the common carrier needs to contact the purchaser or recipient to facilitate delivery of the products to the appropriate location. At your request, shipping information may be saved for faster checkout on future orders.

**Payment:** CBG requires users to input the following payment information: credit or debit card information, first and last name, billing address, card expiration date, and three-digit security code.

**Email Addresses & Contact Information:** Users may also provide their email address and/or other contact information to CBG to subscribe to its newsletters, to contact us through the Site with questions about our Site and Services, or to reset their password. When users make a purchase, users may also subscribe to CBG’s newsletters. Users can opt-out through the unsubscribe link in that newsletter or corresponding email.

**Cookies:** CBG utilizes cookie technology to gather information on internet use in order to serve you more effectively. As described in Section 2, CBG also utilizes third party analytics services which may also use tracking cookies to provide information about the use of our Site. Users can set their browser to remove or reject the following cookies utilized by the Site:



- `_session_id`, unique token, sessional, Allows Shopify to store information about your session (referrer, landing page, etc).
- `_shopify_visit`, no data held, Persistent for 30 minutes from the last visit, Used by our website provider's internal stats tracker to record the number of visits
- `_shopify_uniq`, no data held, expires midnight (relative to the visitor) of the next day, Counts the number of visits to a store by a single customer. `cart`, unique token, persistent for 2 weeks, Stores information about the contents of your cart.
- `_secure_session_id`, unique token, `sessional_storefront_digest`, unique token, indefinite. If the shop has a password, this is used to determine if the current visitor has access.

## 2. Is Information Collected By Or Disclosed To Third Parties?

**CBG DOES NOT AND WILL NOT SELL, RENT, OR LEASE PERSONAL INFORMATION. HOWEVER, PERSONAL INFORMATION IS PROCESSED BY SERVICE PROVIDERS WHO HAVE CONTRACTED WITH CBG TO FACILITATE THE PROVISION OF SERVICES THROUGH THE SITE AS FOLLOWS:**

**Shopify:** CBG's Site is powered by Shopify, a commerce company that provides software and retail point of sale systems for online stores and merchants. Shopify collects our customers' name, email, shipping and billing address, payment details, company name, phone number, IP address and device data to enable the shopping capabilities of the Site, including supporting and processing orders, authentication and processing payments. This information is also used to improve Shopify's Services. Information is collected by Shopify when CBG's customers use or access the Shopify services through the Site, such as when a customer visits the Site, places an order, or signs up for an account on the Site. Please refer to Shopify's Terms of Service and Shopify's Privacy Policy for more information about their data collection practices.

**Google Analytics:** CBG utilizes Google Analytics to access anonymized data to help us understand how our Services are used. Google Analytics is a web analytics tool that helps CBG understand how users engage with the Site, so that we can review and improve our Services. Google Analytics collects information anonymously. It provides a report to CBG with website trends without identifying individual visitors. Please see the Google Privacy Policy for more information on their disclosures. If you do not want your data to be used by Google Analytics, you may opt-out by Google Analytics Opt-out Browser Add-on.

**Credit or Debit Card Information:** CBG does not itself store debit or credit card information on its servers. CBG utilizes Shopify Payments (powered by Stripe), to process payments on the Site. Please see Stripe's



Privacy Policy, Shopify's Privacy Policy, for more information on their privacy disclosures.

**Shipping Information:** Shipping Information: CBG utilizes service providers to access major shipping carriers, track packages and obtain shipping labels. Information may be shared with such service providers to process shipping requests. Shipping information will also be shared with our Product Partners to provide fulfillment services for all customer orders.

**Web Hosting:** Personal Data is stored on cloud servers maintained by [Google Web Hosting](#). For more information on its privacy policy, please see [Google's Privacy Policy](#).

**Customer Communications:** CBG utilizes Constant Contact to assist in customizing its email marketing campaigns to its customers. Please refer to Constant Contact Privacy Policy for additional information.

**Social Plug-Ins:** Users may share their CBG experiences on social media. Users may follow and share their experiences on Instagram, Facebook, LinkedIn and Pinterest. Users should click on the hyperlinks to review the applicable privacy policies.

**Other Potential Third Party Disclosures:** Personal Information may be disclosed to third parties to serve our legitimate business interests as follows: (1) as required by law, such as to comply with a subpoena, or similar legal process, (2) if CBG is involved in a merger, acquisition, or sale of all or a portion of its assets, (3) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (4) enforce our agreements with you, and/or (5) investigate and defend ourselves against any third-party claims or allegations. We will use commercially reasonable efforts to notify you about law enforcement or court ordered requests for data unless otherwise prohibited by law.

*Please see Section 5 for a more specific disclosure of the applicable categories of personal information collected and processed under the CCPA.*

### **3. How Does CBG Comply With The Children's Online Privacy Protection Act and Other Privacy Regulations Relating to Children?**

CBG does not knowingly collect Personal Information from anyone under the age of 18. If a parent or guardian becomes aware that his or her minor child as defined by applicable privacy laws has provided Personal Information without their consent, he or she should contact CBG at [linda@couturegifting.com](mailto:linda@couturegifting.com). CBG will delete such Personal Information from our files within a commercially reasonable time, but no later than required under applicable law.

### **4. How Long Does CBG Retain Information Collected?**

Unless erasure is otherwise requested by a customer, CBG will retain account and purchase data as long as it is necessary to provide services our customers. When a customer's account is terminated or closed upon request, Personal Data collected through the Site will be deleted in accordance with applicable law. Personal Information obtained from Site visitors will be maintained as long as it is necessary to provide requested communications and information-based services or until a visitor exercises the right to opt-out of



requested communications or information-based services. Anonymized and pseudo-anonymized data will be retained as long as CBG determines such data is commercially necessary for its legitimate business interests.

## 5. YOUR CALIFORNIA PRIVACY RIGHTS

California Consumer's Request to Know, Right to Delete, Right to Opt-Out of Sale Notices. For Information on your California Consumer Rights, please see: California Consumer Privacy Rights Notice ("Notice")

A Verifiable Consumer Request under this Section may be submitted to CBG effective January 1, 2020 by emailing CBG at [hello@couturegifting.com](mailto:hello@couturegifting.com) or through the account or as otherwise designated in the Notice.

For each request, CBG will initially verify the email address on file with the email address submitted in the applicable request. Further verification will be based upon confirmation of data correlating to information maintained by CBG, as applicable. Consumers may designate an authorized agent to make a request on the Consumer's behalf at [hello@couturegifting.com](mailto:hello@couturegifting.com). Requests by authorized agents are subject to additional verification requirements pursuant to the rules and regulations set forth in the CCPA.

## 6. What Is the CBG Security Policy?

We have implemented reasonable administrative, technical and physical security measures to protect Personal Information against unauthorized access, destruction or alteration.

CBG utilizes only PCI-DSS compliant third party payment processors to ensure the security of your personal information. Credit/debit card information provided is encrypted using secure socket layer technology (SSL) and stored with a AES-256 encryption.

## 7. How Does The Site Respond To "Do Not Track" Signals?

"Do Not Track" is a feature enabled on some browsers that sends a signal to request that a website disable its tracking or cross-Site user tracking. At present, the Site does not respond to or alter its practices when a Do Not Track signal is received.

## 8. How Will I Be Notified Of Changes To Your Privacy Policy?

If we make material changes to our Privacy Policy, we will notify you by (1) changing the Effective Date at the top of the Privacy Policy, or (ii) sending an electronic notification to all active account holders, or (iii) adding a banner/notification to the Site itself.

## 9. Contact Us

If you have any questions regarding your Personal Information or about our privacy practices, please contact us at: Couture Business Gifting, 17438 W. Cocopah St, Goodyear, AZ 85338 and at [hello@couturegifting.com](mailto:hello@couturegifting.com).

## Privacy



We collect personally identifiable information, like names, postal addresses, email addresses, etc., when voluntarily submitted by our visitors. The information you provide is used to fulfill your specific request. This information is only used to fulfill your specific request, unless you give us permission to use it in another manner, for example to add you to one of our mailing lists.

We may share information with governmental agencies or other companies assisting us in fraud prevention or investigation. We may do so when: (1) permitted or required by law; or, (2) trying to protect against or prevent actual or potential fraud or unauthorized transactions; or, (3) investigating fraud which has already taken place.

We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

If our store is acquired or merged with another company, your information may be transferred to the new owners so that we may continue to sell products to you.

### *Security*

To protect your personal information, we take reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed. If you provide us with your credit card information, the information is encrypted using secure socket layer technology (SSL) and stored with a AES-256 encryption. Although no method of transmission over the Internet or electronic storage is 100% secure, we follow all PCI-DSS requirements and implement additional generally accepted industry standards.