

# LuLaRoe Privacy Policy

## Our Commitment to Privacy

This Privacy Policy has been developed as an extension of our commitment to combine quality products and services with integrity in dealing with users. The Policy is designed to assist you in the understanding of how LuLaRoe, LLC (“LuLaRoe,” “we,” “our,” or “us”) collects, uses, and protects the personal information provided to us through use of [www.lularoe.com](http://www.lularoe.com) and any other affiliated websites or other online or mobile services or applications (collectively the “Site”). LuLaRoe is the data controller for the Site.

## What Information Do We Collect?

When you visit our Site, we collect two types of information: personal information you actively choose to disclose (“Active Information”), and use information collected in a way not visible to you on an anonymous aggregate basis as you and other users browse our Site (“Passive Information”).

### 1. Active Information

Active Information refers to information that you choose to disclose. It consists of Personally Identifiable Information that lets us know specifically about you. In order to gain use of some features of the Site, we may request that you disclose some or all of the following Personally Identifiable Information: name, address, phone number, email address, and/or birth date. We use secure socket layer (SSL) encryption to protect the transmission of the information you submit to us when you use our secure online forms. The information you provide to us is stored securely.

#### A. Ordering

When you place an order for products or services, we collect Personally Identifiable Information (such as name, contact and billing information, credit card, and other transactional information). We use this information to deliver your order, process payment, and to communicate the status of your order.

#### B. Credit Card Storage

Credit card information collected at registration or for product orders is used only to process payment for the transaction and, generally, is not retained on our Site. However, in some instances you may voluntarily elect to store credit cards to be used for product orders.

### C. Surveys and Promotions

Occasionally, you may voluntarily provide Personally Identifiable Information to complete surveys and questionnaires or to participate in user polls. We use this information to improve our products and services and to ensure that we're providing accurate disclosures. We may also use your Personally Identifiable Information to provide you newsletters and other marketing information that coincide with your preferences. For information regarding opting out of receiving promotional materials, please refer to Section 3 below.

### D. Registration

It may be possible to create a user account on the Site. In such instances, we may collect Personally Identifiable Information (such as name, address, email address, phone number, email address, and/or birth date). This information is securely stored and may be accessed on the Site. Please safeguard any usernames or passwords you may receive as a result of any registration.

## 2. Passive Information

Passive Information is information that is collected on an anonymous and aggregate basis anytime you visit our Site. Passive Information that is collected includes Aggregate Information and Cookies.

### A. Aggregate Information

Aggregate Information is information that does not, by itself, identify you as a specific individual. Such information includes the Uniform Resource Locator ("URL") of the website that referred you to our Site, your Internet Protocol ("IP") address (a number automatically assigned to your computer whenever you surf the web), your operating system and browser type, and any search terms that you enter on our Site. Our web server aggregates this information in order to monitor the level of activity on our Site, evaluate its effectiveness, and improve the content of our Site in order to make your visit an easy and enjoyable experience.

We may collect, compile, store, publish, promote, report, or otherwise disclose or use any Aggregate Information, provided that such information does not personally identify you.

### B. Cookies

Cookies are a feature of web browser software that allows web servers to recognize the computer used to access a site. They are small pieces of data stored by a user's browser to simplify subsequent interactions with the site. This makes it easier for a user to move from site to site and to complete transactions over the Internet. Cookies should make your online experience easier and more personalized.

Our Site utilizes cookies to collect information about how our Site is used. Passive Information gathered may include the date and time of visits, the Site pages viewed, time spent at our Site, the sites visited just before and just after visiting our Site. If you do not wish to transmit “cookie” information about yourself, you may turn off the cookie function in your web browser.

Our Site’s servers also automatically identify your computer by its IP address, which is a unique string of numbers that are assigned to your computer by your Internet Service Provider. The IP address may be used to address problems with our server or to gather broad demographic information about users. We passively collect your IP Address.

### 3. How Do We Use the Information Collected?

Broadly speaking, persons we employ directly, or as contractors or agents at our direction use Active Information for purposes of administering our business activities, providing customer support and making available other products or services we think might be of interest to users. We may use information you provide to contact you about various changes to our Site, new services, features, or products we offer. This may include sending notifications, promotions, or other communications to you via email or SMS messaging. If at any time you do not wish to receive information related to marketing or sent for commercial purposes, you may unsubscribe by using the opt-out button provided in such messages.

We use Passive Information to gather information about users and to enhance our Site to make it easier, faster and friendlier for users. Additionally, cookies help us better understand the usage pattern of the people that visit our Site, which helps us improve our services, features, and products. Passive Information may result in your viewing of particular content based on your user habits.

### 4. Sharing Information with Third Parties

We may disclose Passive Information about user habits to third parties. The parties who perform services for us (credit card processors, merchant banks, Internet Service Providers) may also have access to your information in performing such services.

### 5. Sharing Information with the Government or As Otherwise Required by Law

We may be required by law to disclose both Active and Passive Information you have provided to us.

### 6. Accessing and Correcting Your Information

We take reasonable measures to ensure that any Personally Identifiable Information we collect on our Site is accurate, current, complete, and reliable for its intended use. We also want to make sure you are able to control the information you provide to us. If you wish to update or otherwise correct Personally Identifiable Information provided to us, you may edit your information online.

## 7. Protecting Your Information

We acknowledge your trust and are committed to take reasonable steps to protect Personally Identifiable Information from loss, misuse, and unauthorized access. We secure your information by using reasonable efforts to prevent unauthorized access or disclosure, or accidental loss of Active and Passive Information. We employ physical, electronic, and managerial processes to safeguard and secure your information.

In situations where a password may be granted or required on our Site, it is your responsibility to safeguard the password and to promptly advise us if you ever suspect that your password has been compromised. We strongly encourage you to change your password regularly to prevent unauthorized access. Because your username password are specific to you, you acknowledge sole responsibility for any and all use of our Site conducted with your username and password.

## 8. Retention of Data, Data Deletion, and Data Portability

We may retain your personal information for as long as is necessary to carry out the services and functions of the Site, or for as long as any user account you may have for use on this Site exists. We may also retain your information in order to comply with legal obligations. You may contact us at any time to request that your personal information be deleted or to restrict the processing of your information. You may receive the personal data you have provided to us in a structured, commonly-used, and machine-readable format.

## 9. Notification of Data Breach

If a breach in data occurs, we will notify all affected users of the security breach within 72 hours of its discovery where required by law. Such notification may be made by email, telephone message, and/or public announcement.

## 10. Links to Other Websites

You may be able to access third-party websites through our Site via hyperlinks. Using these links will direct you away from our Site. This Privacy Statement does not cover the information practices of other websites, nor do we control the content or privacy policies of these other websites. We suggest that you carefully review the privacy policies of each site you visit.

## 11. Social Media Features

You may be able to share content from the Site to various social media or news websites via integrated sharing tools, which may subject you to the privacy policies of those websites. We recommend that you review the privacy policies of any third-party social media or news websites that provide these sharing features for more information about their data collection and processing.

## 12. Children's Privacy Protection

We take special care to protect the privacy needs of children and encourage parents to be an active participant in their child's online activities. Our Site does not target and is not intended for children under the age of 18, and we will not knowingly collect Personally Identifiable Information from them. If we discover personal data from a child through our Site, we will eliminate that data. You may learn more about protecting children's privacy online by visiting:  
<http://www.ftc.gov/bcp/edu/pubs/consumer/tech/tec08.shtm>

## 13. Changes to This Policy

Any updates or changes to the terms of this Privacy Policy may be posted on our Site and the date of the newest version posted below. Please check back frequently, especially before you submit any Personally Identifiable Information at our Site, to see if this Privacy Policy has changed. By using our Site, you acknowledge acceptance of this Privacy Policy in effect at the time of use.

YOUR USE OF OUR SITE MEANS THAT YOU ACCEPT THE PRACTICES SET FORTH IN THIS PRIVACY POLICY. YOUR CONTINUED USE INDICATES YOUR AGREEMENT TO THE CHANGES. WE DISCLAIM ANY DUTY TO SEND NOTICES BY EMAIL OR ANY OTHER MEANS IF AND WHEN THIS PRIVACY POLICY IS AMENDED OR MODIFIED.

Any questions or complaints can be directed via email to [privacypolicy@lularoe.com](mailto:privacypolicy@lularoe.com).