

# Siren Floral Co LLC **Privacy Policy**

Last Modified: April 21, 2020

Siren Floral Co LLC respects your privacy and is committed to protecting it through our compliance with this "Privacy Policy." Throughout this Privacy Policy, we refer to any person accessing or using this website as "you," or the "User."

This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit our website at <a href="www.sirenfloralco.com">www.sirenfloralco.com</a> or our learning platform found at <a href="www.siren-floral-co.thinkific.com">www.siren-floral-co.thinkific.com</a> (collectively, our "Platforms"), and our practices for collecting, using, maintaining, protecting and disclosing that information.

This Privacy Policy applies to information we collect:

- On or through these Platforms;
- In electronic messages facilitated through the Platforms, email, or text between you and Siren Floral Co LLC: and/or
- When you interact with our applications on third-party websites, if those applications include links to this Privacy Policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any social media platform profile operated by Siren Floral Co LLC or any website operated by a third party, unless this Privacy Policy is linked: or
- Any third party, including through any third-party website that may link to or be accessible
  from, or on, the Platforms. Please be aware that we have no control over the content and
  policies of third-party websites and cannot accept responsibility or liability for their respective
  privacy practices.

Please read this Privacy Policy carefully to understand our policies and practices regarding your "Personal Information" (as defined below in INFORMATION WE COLLECT) and how we will treat it. If you do not agree with our policies and practices, your only choice is not to use our Platforms. By accessing or using these Platforms, you agree to this Privacy Policy. This Privacy Policy may change from time to time. Your continued use of these Platforms after we make changes is deemed to be your acceptance of those changes, so please check the Privacy Policy periodically for updates.

# Siren Floral Co LLC's Privacy Assurance

- We do not sell your Personal Information to third parties.
- We do not share your Personal Information with third parties that would use it to contact you about their own products and services, unless you have allowed us to do so and as permitted pursuant to a joint marketing agreement.
- We require our employees and contractors to protect your Personal Information and keep it confidential.
- We require persons or organizations that represent or assist us (like our lawyers) to keep your information confidential.

#### CHILDREN UNDER THE AGE OF 13:

Our Platforms are not intended for children under 13 years of age. No one under the age of 13 may provide any Personal Information to, or on, the Platforms. We do not knowingly collect Personal Information from children under 13. If you are under 13, do not use or provide any information on these Platforms, or on or through any of its features/functionality, make any purchases through the Platforms, use any of the interactive features that may be available on these Platforms, or provide any information about yourself to us, including your name, address, telephone number, email address or any username you may use. If we learn that we have collected or received Personal Information from a child under 13, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at hello@sirenfloralco.com.

#### INFORMATION WE COLLECT:

We collect several types of information from and about users of our Platforms, including log data, device data, and Personal Information.

#### Log Data

When you visit our Platforms, our servers may automatically log the standard data provided by your web browser. It may include your computer's Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, and other details.

#### Device Data

We may also automatically collect data about the device you're using to access our Platforms. This data may include the device type, operating system, unique device identifiers, device settings, and location data. What we collect depends on the individual settings of your device

and software.

#### Personal Information

We may collect information from you while you use these Platforms, including:

- By which you may be personally identified, such as your name, postal address, email address, telephone number, credit information, and other identifying information that you choose to share with us by which you may be contacted online or offline ("Personal Information"); and/or
- That is about you but individually does not identify you, such as your annual revenue, gender, certain demographic information. This information is not considered Personal Information, as it is anonymized statistical data.

#### HOW WE COLLECT INFORMATION:

## Information We Collect Automatically

As you navigate through and interact with our Platforms, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, as described above. The technologies we use for this automatic data collection may include cookies, flash cookies, or web beacons. For more information on these technologies, see our DATA COLLECTION POLICY below. The information we collect automatically is statistical data and does not include Personal Information, but we may maintain it for the any of the reasons listed in HOW WE USE YOUR INFORMATION.

Information You Provide Directly to Us

The information we collect on or through our Platforms may include:

- Information that you provide by filling in forms on our Platforms. This includes information provided at the time of registering to use our Platforms signing up for our newsletter mailing list. We may also ask you for information if you report a problem with our Platforms:
- Records and copies of your correspondence (including email addresses), if you contact us: and/or
- Details of transactions you carry out through our Platforms.

#### Information Provided to Us by Third Parties

If we receive Personal Information about you from a third party (including but not limited to third party application providers, like <u>Zoom</u> when you register for an event or class), we will protect it as set out in this Privacy Policy. If you are a third party providing Personal Information about somebody else, you represent and warrant that you have such person's consent to provide the Personal Information to us.

#### **DATA COLLECTION POLICY:**

The technologies we use for automatic data collection on these Platforms may include:

• Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your

browser. However, if you select this setting you may be unable to access certain parts of our Platforms. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Platforms;

- Flash Cookies. Certain features of our Platforms may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on our Platforms. Flash cookies are not managed by the same browser settings as are used for browser cookies; and/or
- Web Beacons. Pages of the Platforms, and our emails, may contain small electronic files known as web beacons (also referred to as clear gifs. pixel tags and single-pixel gifs) that permit Siren Floral Co LLC, for example, to count users who have visited those pages, or opened an email, and for other related Platforms statistics (for example, recording the popularity of certain Platforms content and verifying system and server integrity).

#### DO NOT TRACK:

"Do Not Track" is a preference you can set in your browser to let websites you visit know that you do not want them collecting certain information about you. We do not currently respond to, or honor, Do Not Track signals or requests from your browser.

#### THIRD-PARTY USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES:

Some content or applications on the Platforms are served by third parties, including but not limited to application providers. These third parties may use cookies (alone or in conjunction with web beacons or other tracking technologies) to collect information about you when you use our Platforms. The information they collect may be associated with your Personal Information, or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

# **HOW WE USE YOUR INFORMATION:**

We may collect your information for a number of reasons, specifically:

- To enable you to access and use our Platforms;
- To enable you to register for classes through our Platforms;
- To contact and communicate with you;
- To prevent fraud;
- For internal record keeping and administrative purposes;
- For analytics, market research, and business development, including to operate and improve our Platforms;
- To offer additional benefits to you, including but not limited to sending promotional information about our products/services and/or facilitating sweepstakes and/or giveaways;
- To provide you with information about third parties that may be of interest to you;
- To fulfill any other purpose for which you provide your information and consent; and/or
- To comply with our legal obligations and resolve any disputes that we may have.

As stated above, we may use your information to contact you about our own and third-parties' services that may be of interest to you. If you do not want us to use your information in this way, please send an email to hello@sirenfloralco.com or update your email subscription settings.

#### DISCLOSURE OF YOUR INFORMATION, GENERALLY:

We disclose Personal Information that we collect or that you provide, as described in this Privacy Policy, in the following circumstances:

- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them:
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Siren Floral Co LLC's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information held by Siren Floral Co LLC about our Platforms' users is among the assets transferred. You acknowledge that such transfers may occur, and that any parties who acquire us may continue to use your Personal Information according to this Privacy Policy;
- To fulfill the purpose for which you provide it;
- For any other purpose disclosed by us when you provide the information; or
- With your consent.

#### DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES:

We may disclose your Personal Information to third party service providers for the purpose of enabling them to provide their services, including but not limited to:

- Floral Wholesalers for online classes;
- Information Technology ("IT") service providers;
- Data storage, hosting, and server providers;
- Analytics providers:
- Marketing or advertising providers;
- Payment systems operators; and/or
- Sponsors or promoters of any competition or promotion we run.

We may also disclose your Personal Information to third parties for the purpose of establishing, exercising, or defending our legal rights, including but not limited to:

- Debt collectors:
- Our legal counsel and/or prospective legal counsel; and/or
- Courts, tribunals, regulatory authorities, and law enforcement officers, as required by law.

We may disclose aggregated, anonymized, statistical data and/or non-identifying information about our users without restriction.

#### CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION:

We strive to provide you with choices regarding the Personal Information you provide to us. The following mechanisms should help to provide you with control over your information:

• Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage

- your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of these Platforms may be inaccessible or not function properly.
- Promotional Offers from Siren Floral Co LLC or Our Affiliates. If you do not wish to have your email address/contact information used by Siren Floral Co LLC or our affiliates to promote our own or third parties' products or services, you can opt-out by sending us an email stating your request to <a href="hello@sirenfloralco.com">hello@sirenfloralco.com</a>. If we have sent you a promotional email, you may use the unsubscribe option in the footer of the email. This opt out does not apply to information provided to Siren Floral Co LLC as a result of a product or service purchase, or other transactions.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

## **ACCESSING AND CORRECTING YOUR INFORMATION:**

If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you can review and change your Personal Information by logging into your account profile on the Platforms (if you have an account) and navigating to the appropriate settings page or by sending us an email at <a href="hello@sirenfloralco.com">hello@sirenfloralco.com</a> to request access to, correct, or delete any Personal Information that you have provided to us. We cannot delete some of your Personal Information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or regulatory requirement, result in fraud, or cause the information to be incorrect.

#### YOUR CALIFORNIA PRIVACY RIGHTS:

If you are a California resident, you have the right to request information from us regarding the manner in which we share certain categories of your Personal Information with third parties for their own direct marketing uses. California's "Shine the Light" Act provides that you have the right to submit a request to us at our email address in order to receive information on the categories of customer information that we shared and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year. To obtain this information, please send an email message to <a href="hello@sirenfloralco.com">hello@sirenfloralco.com</a> with "Request for California Privacy Information" in the subject line and in the body of your message. We will provide the requested information to you in your email address in response.

Please be aware that not all information sharing is covered by the Shine the Light requirements, and only information on covered sharing will be included in our response.

# <u>DATA SECURIT</u>Y:

We won't keep Personal Information for longer than is necessary to present our Platforms to you or to provide our services to you.

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure. All information you provide to us through

the Platforms are secured by TLS technology, and is stored on our secure, password protected servers behind firewalls.

Any payment transactions will be encrypted using SSL technology. We use Stripe and PayPal (both PCI-DSS compliant) as our payment processors.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Platforms, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Platforms. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Platforms.

#### **CHANGES TO OUR PRIVACY POLICY:**

It is our policy to post any changes we make to our Privacy Policy on this page, with a notice that the Privacy Policy has been updated on the Platforms' home page. If we make material changes to how we treat our users' Personal Information, we will notify you through a notice on the Platforms home page. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Platforms and this Privacy Policy to check for any changes.

#### CONTACT INFORMATION:

To ask questions or make a comment about this Privacy Policy and our privacy practices, contact us at: <a href="mailto:hello@sirenfloralco.com">hello@sirenfloralco.com</a> or 1878 Main Street, Unit F, San Diego, California 92113.