

# PRIVACY POLICY

**Last Modified:** 10, 2019

This Privacy Policy explains how EyeClick (“EyeClick,” “we,” “us,” or “our”) collects, uses, and discloses your information. The Privacy Policy applies to all services and products, except those products that have a separate Privacy Policy.

Where applicable, you consent to the use of your information as described in this Privacy Policy each time you use our Services, so we urge you to read this document in full, and approach us at: [Privacy@eyeclick.com](mailto:Privacy@eyeclick.com) if you have any questions. If not otherwise defined herein, capitalized terms shall have the meaning ascribed to them in the terms and conditions, available at <https://buyobie.com/terms-and-conditions/> (the “**Terms and Conditions**”) into which this Privacy Policy is incorporated thereto by reference.

## **COLLECTION AND USE OF PERSONAL INFORMATION**

Personal information is information that can be used to directly or indirectly identify you. Personal information also includes anonymous information that is linked to information that can be used to directly or indirectly identify you. Personal information does not include information that has been irreversibly anonymized or aggregated so that it can no longer enable us, whether in combination with other information or otherwise, to identify you.

Here is a description of the types of personal information we may collect and how we may use it:

### What Personal Information We Collect

Depending on the services you use, we collect different kinds of personal information from or about you.

- **Information you provide:** We may collect some types of personal information you provide voluntarily — such as your name, username, physical address and email address — when you use our services, create an account, approach us at: [Privacy@eyeclick.com](mailto:Privacy@eyeclick.com), participate in an online survey, participate in community discussions or chat rooms, apply for employment, interact with us at in-person events, or otherwise interact with us. With respect to any personal information of your child or a child under your custody or legal guardianship, you hereby represent and warrant that you give your verifiable parental consent to such collection and retention of personal information in compliance with applicable law.
- **Information about payments:** If you make a purchase, we collect personal information in connection with the purchase. This information includes payment information, such as your credit or debit card number and other card information; other account and authentication information; and billing, shipping, and contact details.
- **Information about use of our Services:** When you visit our Website or use our services, we may collect information about the type of device you use, your device’s unique identifier, the IP address of your device, your operating system, the type of Internet browser that you use, usage information, diagnostic information, browsing information, session summary information, file attributes (including attributes for photos, videos, music, and documents), and location information from or about the computers, phones, or other devices on which you install or access our products or services. We may gather

some of this information automatically. Where available, our services may use GPS, your IP address, and other technologies to determine a device's approximate location to allow us to improve our services.

- **Information from third parties:** We may collect information from third parties, including business partners and marketing agencies. This includes your contact information from marketing partners when we engage in joint marketing or co-branding activities, your IP address or location information from service providers to offer certain products and services relevant to your location.

### Legal Basis for Processing

Our collection and processing of personal information is based on the following:

- a. The need to carry out the above processing of information, which is in anticipation of entering into commercial engagements or as part of the performance of existing engagements with you, for example for providing you the Goods and items that you ordered through our Website.
- b. To the extent that we use the personal information for advertising or promotional activities, including direct mailing and targeted advertising, we will request your specific, freely-given, unbundled, informed and separate consent to such uses.
- c. To the extent that we use the personal information to improve this Website, services or for analyzing statistics, the basis for collection of data is our legitimate interest to conduct such improvements and analysis.

### How We Use Your Personal Information

Generally speaking, we use personal information to provide the Goods you have ordered and to further improve and develop our different products and services, to communicate with you, to offer you targeted advertisements and services, and to protect us and our users.

EyeClick collects, processes, and determines how to process your personal information as data controller for the following purposes:

- **Processing Orders and providing Goods to you:** We may use personal information and other contact information, for the purpose of processing your Orders and purchases and delivering the Goods you ordered to you, for example, arranging for shipping and handling, processing your payment details and managing your returns.
- **Providing, improving, and developing our Services:** We may use personal information to help us provide, improve, and develop our Website, Goods, services, products and advertising. This includes using personal information for purposes such as data analysis, research, and audits. Such processing is based on our legitimate interest in offering you products and services and for business continuity.
- **Communicating with you:** Subject to your prior express, free and informed consent, we may use personal information to send you marketing communications in relation to EyeClick's own products and services; communicate with you about your account or transactions; and inform you about our policies and terms. Also subject to your prior express consent, we may share your personal information with third-party partners who may send you marketing communications in relation to their products and services. If you no longer wish to receive email communications for marketing purposes, please approach us at: [Privacy@eyeclick.com](mailto:Privacy@eyeclick.com) to opt out. We may use your information

to process and respond to your requests when you approach us at:  
[Privacy@eyeclick.com](mailto:Privacy@eyeclick.com).

- **Offering and measuring targeted advertisements and services:** Subject to your prior express consent, we may use personal information to personalize your experience with our Website and services, on third-party websites and applications, and to determine the effectiveness of our promotional campaigns.
- **Provide customer service and answer you inquiries:** when you submit inquiries or requests with respect to the Website, services, Goods or our products, or when you contact us for such purpose. We will use such information to contact you only for the purposes for which you sent the inquiry.

For any of the uses of your data described above that require your prior express consent, note that you may withdraw your consent by approach us at: [Privacy@eyeclick.com](mailto:Privacy@eyeclick.com).

- **Promoting safety and security:** We use personal information to help verify accounts and user activity, as well as to promote safety and security, such as by monitoring fraud and investigating suspicious or potentially illegal activity or violations of our terms or policies. Such processing is based on our legitimate interest in helping ensure the safety of our products and services.

As a global company, EyeClick Corporation has a number of corporate affiliates in different jurisdictions. Each of these affiliates collects, processes and determines how to process your personal information as a data controller to help provide you the products and services you request.

## **COOKIES AND SIMILAR TECHNOLOGIES**

We may use cookies and similar technologies to provide, protect, and improve our products and services, such as by personalizing content, offering and measuring advertisements, understanding user behavior, and providing a safer experience.

You can remove or reject cookies using your browser or device settings, but in some cases doing so may affect your ability to use our products and services.

Please read our Cookie Policy to learn more about how we use cookies and the choices you have.

## **DISCLOSURE OF PERSONAL INFORMATION**

We make certain personal information available to strategic partners that work with us to provide our services and Goods or help us market to customers. Personal information will only be shared by us with these companies in order to process your Orders and provide you with the Goods or improve our products, services, and advertising; it will not be shared with third parties for their own marketing purposes without your prior express consent.

### Service Providers

We share personal information with companies that provide services on our behalf, such as shipping and handling companies; carriers; credit card payment services; website hosting; email services; marketing and other promotions; auditing; payment processing; fulfilling customer orders; data analytics; providing customer services and support; conducting customer research and satisfaction surveys; and other services that assist in our services and selling our Goods and

other products. We will only provide these service providers the information they need to perform the applicable service, and they are prohibited from using that information for any other purpose. These companies are obligated to protect your information and may be located wherever we operate.

#### Corporate Affiliates and Corporate Business Transactions

Because EyeClick is a global company we may share personal information with all EyeClick Corporation-affiliated companies. All such entities are governed by this Privacy Policy or are bound by the appropriate confidentiality and data transfer agreements. In the event of a merger, reorganization, acquisition, joint venture, assignment, spin-off, transfer, or sale or disposition of all or any portion of our business, including in connection with any bankruptcy or similar proceedings, we may transfer any and all personal information to the relevant third party.

#### Legal Compliance and Security

It may be necessary — by law or as a result of legal process, litigation, or requests from public or governmental authorities within or outside your country of residence — for us to disclose personal information. We may also disclose personal information if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose personal information if we determine in good faith that disclosure is reasonably necessary to protect our rights and pursue available remedies, enforce our Terms and Conditions, investigate fraud, or protect our operations or users.

We will not sell or otherwise transfer the personally identifiable information you provide to us at our Website to any third parties for their own direct marketing use unless we provide clear notice to you and obtain your explicit consent for your data to be shared in this manner.

### **YOUR RIGHTS**

We take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date. Depending on where you live, you may have the rights described below.

You have the right to access, correct, or delete the personal information that we collect. You are also entitled to object to or restrict, at any time, the further processing of your personal information. You have the right to receive your personal information in a structured and standard format. You may lodge a complaint with the competent data protection authority regarding the processing of your personal information.

To protect the privacy and the security of your personal information, we may request information from you to enable us to confirm your identity and right to access such information, as well as to search for and provide you with the personal information we maintain. There are instances where applicable laws or regulatory requirements allow or require us to refuse to provide or delete some or all of the personal information that we maintain.

You can opt-out of receiving marketing communications by modifying your preferences in the User Account or by modifying your email or SMS subscriptions by clicking on the unsubscribe link or following the opt-out instructions included in the message. Alternatively, you can contact us using the contact details below.

You may approach us at: [Privacy@eyeclick.com](mailto:Privacy@eyeclick.com) to exercise your rights. We will respond to your request in a reasonable timeframe, and in any event in less than 30 days.

### California Privacy Rights

If you are a California resident, California law permits you to request information regarding the disclosure of your personal information to third parties for the third parties' direct marketing purposes. To make such a request, please approach us at: [Privacy@eyeclick.com](mailto:Privacy@eyeclick.com) and include "California Privacy Rights Request" in the first line of the request.

### **CLOSING ACCOUNTS**

Please approach us at: [Privacy@eyeclick.com](mailto:Privacy@eyeclick.com) to close your account in relation to the following uses of your personal information:

- providing, improving, and developing our services;
- communicating with you;
- sharing your personal information with third-party partners for marketing communications;
- offering and measuring targeted advertisements and services;
- provide customer service and answer you inquiries;
- promoting safety and security; or
- providing Goods (for such requests, EyeClick Technologies, Inc. will act on behalf of its local affiliates).

If you close your account, we have no obligation to retain your information, and we may delete any or all of your information without liability. We may retain, however, information related to you if we believe it may be necessary to prevent fraud or future abuse, if required by law, or for legitimate purposes, such as analysis of non-personal information, account recovery, auditing our records, or enforcing our rights and obligations under our agreements.

### **THIRD-PARTY WEBSITES AND SERVICES**

Our products and services, including our websites and digital media properties, may contain links to or the ability for you to access third-party websites, application, products, and services. We are not responsible for the privacy practices employed by those third parties, nor are we responsible for the information or content their products and services contain. This Privacy Policy applies solely to information collected by us. We encourage you to read the privacy policies of any third parties before proceeding to use their websites, application, products, or services.

### **INFORMATION SECURITY, INTEGRITY, AND RETENTION**

It is important that you take precautions to protect against unauthorized access to your EyeClick User Account credentials, and computers or other devices. If you feel that the security of your User Account or personal information has been compromised, please immediately approach us at: [Privacy@eyeclick.com](mailto:Privacy@eyeclick.com).

EyeClick safeguards the security of the data you send us with physical, electronic, and managerial procedures, taking into consideration the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of processing your personal information. While we strive to protect your personal information, we cannot ensure the security

of the information you transmit to us, and so we urge you to take every precaution to protect your personal data when you are on the Internet. Please be aware that, despite our efforts, no security system is impenetrable. In the event of a security breach, we will promptly notify you and the proper authorities if required by law.

We will retain your personal information for as long as it is necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

## **CHILDREN**

We do not knowingly collect, use, or disclose information from children under 16. If we learn that we have collected the personal information of a child under 16 — or the equivalent minimum age depending on the jurisdiction, such as 13 in the United States — we will take steps to delete the information as soon as possible. Please immediately approach us at: [Privacy@eyeclick.com](mailto:Privacy@eyeclick.com) if you become aware that a child under 16 has provided us with personal information.

If you are a California resident under the age of 18, and you are a registered user of our services, California law permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please approach us at: [Privacy@eyeclick.com](mailto:Privacy@eyeclick.com) with specific information about where the content or information is posted and attesting that you posted it. We will then make reasonable, good faith efforts to remove the post from prospective public view, or anonymize it so you cannot be individually identified, to the extent required by applicable law. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

## **INFORMATION TRANSFERS, STORAGE, AND PROCESSING GLOBALLY**

When we share your personal information with our partners, EyeClick-affiliated companies, and service providers, your personal information may be transferred to and/or made accessible from countries out of the European Economic Area (“EU/EEA”) which in some cases may have a lower level of protection than that within the EU/EEA. When transferring personal data to countries outside the EU/EEA, to jurisdictions that did not receive an adequacy decision by the European Commission we will enter into model contractual clauses as adopted by the European Commission to ensure a sufficient level of protection for your personal information, or rely on alternative legal bases such as the Privacy Shield, where applicable, or binding corporate rules where our partners or service providers have adopted such internal policies approved by European data protection authorities.

## **CHANGES TO THIS PRIVACY POLICY**

We may periodically change this Privacy Policy to keep pace with new technologies, industry practices, and regulatory requirements, among other reasons. We expect most such changes to be minor. Any non-material changes will take effect immediately upon posting of an updated Privacy Policy. There may, however, be cases where changes to the Privacy Policy may be more significant. In such cases, we will provide you either a prominent notice of such changes before they take effect or by directly sending you a notification.

Your continued use of our Website and services after the effective date of the Privacy Policy means that you accept the revised Privacy Policy. If you do not agree to the revised Privacy

Policy, please refrain from using our products or services and approach us at: [Privacy@eyeclick.com](mailto:Privacy@eyeclick.com) to close any account you may have created.

## **APPROACH US**

If you have any questions regarding this Privacy Policy or its implementation, you may e-mail our Data Protection Officer at [DPO@eyeclick.com](mailto:DPO@eyeclick.com).

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## **COOKIES POLICY**

**Last Modified:** 10, 2019

This Cookie Policy explains how EyeClick (“EyeClick,” “we,” “us,” or “our”) uses cookies on our websites, applications, and online services, and the choices you have.

### **DEFINITION OF "COOKIES"**

Cookies are small pieces of text used to store information on web browsers. Cookies are widely used to store and receive identifiers and other information on computers, phones, and other devices. We also use other technologies, including data we store on your web browser or device, identifiers associated with your device, and other software, including web beacons and pixel tags, for similar purposes. In this Cookie Policy, we refer to all of these technologies as “cookies.”

### **TYPES OF COOKIES**

We use cookies to provide, protect, and improve our products and services, such as by personalizing content, offering and measuring advertisements, understanding user behavior, and providing a safer experience. We describe below the various types of cookies we use and the purposes they perform. Please note that the specific cookies we may use vary depending on the specific websites and services you use.

- **Essential cookies:** These cookies are strictly necessary to provide you with our websites and services and to enable essential features, such as providing shopping cart or product application functionality. If you disable these cookies, we will not be able to fulfill your requests.
- **Performance and functionality cookies:** These cookies collect information about how you use our websites and services and allow us to remember the choices you make while browsing. The information these cookies collect allows us to optimize our websites and make them easier for you to use, and it does not personally identify you. If you disable or opt out of these cookies, you may not be able to use certain features of our websites, applications, and services, and it may reduce the support or information that we can provide you.
- **Analytics and customization cookies:** These cookies collect information we use in aggregate form to help us understand how our websites, applications and services are being used and how effective our marketing campaigns are, and to help us customize our websites. If you disable or opt out of these cookies, you may not be able to use certain features of our websites, applications and services, and it may reduce the support or information that we can provide you.
- **Advertising cookies:** These cookies collect information about your browsing or shopping history and are used to make advertising messages more relevant to you. They perform functions like preventing the same advertisement from continuously reappearing, ensuring that advertisements are properly displayed, and in some cases selecting advertisements that are based on your interests. We may share this information with third

parties to help create and deliver advertising personalized to you and your interests. If you disable or opt out of these cookies, you may not be able to use certain features of our websites, applications and services, and it may reduce the support or information that we can provide you.

- **Social networking cookies:** These cookies are used to enable you to share pages and content on our websites and services through third-party social networking and other websites. These cookies may also be used for advertising purposes.

## **COOKIES PLACED BY THIRD PARTIES**

You may also encounter cookies on our websites, applications and services that are placed by third parties. For example, when you buy our products online, our e-commerce vendor may use cookies and other technologies. We may also allow third parties to place cookies on our websites to track information about your online activities and/or across third-party sites or online services, including to send you targeted advertisements based on that information, which may include the remarketing of our products and services that you have viewed on our websites and on third-party websites.

This Cookie Policy does not apply to the cookies, applications, technologies, or websites that are owned and/or operated by third parties, or such third parties' practices, even if they use or access our technology to store or collect information. To understand how third parties use cookies, please review their privacy and cookie policies.

## **CONTROLLING AND OPTING OUT OF COOKIES**

Your browser or device may offer settings that allow you to choose whether browser cookies are set and to delete them. For more information about these controls and to exercise your cookie preferences, visit your browser or device's help material. If you choose to reject cookies, as noted above, you may not be able to use certain features of our websites and services.

## **DO NOT TRACK**

Some browsers include the ability to transmit "Do Not Track" signals. We do not process or respond to "Do Not Track" signals. Instead, we adhere to the standards described in our Privacy Policy and this Cookie Policy.