

# Privacy Policy

We take privacy and the protection of the Personal Information of our customers in the United States and anyone who reads our content around the world very seriously. This Privacy Policy describes how your Personal Information is collected, used, and shared when you visit our website (the “Site”).

## **STORAGE OF ACCESS DATA IN SERVER LOG FILES**

You can visit the Site without giving any personal information. We only store access data in ‘server log files’, such as the name of the file requested, date and time of retrieval, amount of data transferred and the requesting provider, for example. This data is evaluated solely to ensure trouble-free operation of the site and to improve our service and does not enable any conclusions of a personal nature to be drawn.

## **PERSONAL INFORMATION WE COLLECT**

We collect personal data if you provide us with this as part of your order, or when you voluntarily contact us (by contact form or email, for example) or open an account. The data collected can be seen from the respective input forms and includes, but is not limited to names, first and last names, delivery address and possibly credit card information. Data you provide is necessary for the performance of pre-contractual measures. Without these data points we may not be able to provide you with services or products. When you visit our Site, we automatically receive your computer’s IP address, in order to determine which browser and operating system you are using. We use the data provided by you for processing your requests.

To make the visit to our Site attractive and to enable the use of certain functions, we use ‘cookies’ on various pages. These are

small text files that are stored on your Device. Some cookies we use (called ‘session cookies’) are deleted after the end of the browser session, i.e. after closing your browser. Other cookies remain on your Device and allow us to recognize your browser on your next visit (‘persistent’ cookies). You can set your browser so that you are notified about cookie settings and individually decide on their acceptance or block the acceptance of cookies for specific cases, or in general. Not accepting cookies may limit the functionality of our Site.

As stated, we use ‘cookies’ on various pages. These are small text files that are stored on your device. As such, when you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we may collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically collected information as “Device Information.”

We collect Device Information using the following technologies:

- “Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier.
- For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
- “Log files” track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- “Web beacons,” “tags,” and “pixels” are electronic files used to record information about how you browse the Site.

You can set your browser so that you are notified about cookie settings and individually decide on their acceptance or block the acceptance of cookies for specific cases, or in general. Not accepting cookies may limit the functionality of our Site.

When we talk about “Personal Information” in this Privacy Policy, we are talking both about Device Information.

## **HOW DO WE USE YOUR PERSONAL INFORMATION**

We use the Order Information that we collect generally to fulfill any orders placed through the Site (including processing your payment information, arranging for shipping, and providing you with invoices and/or order confirmations). Additionally, we use this Order Information to:

- Communicate with you;
- Screen our orders for potential risk or fraud; and
- When in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.

We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).

## **SHARING YOUR PERSONAL INFORMATION**

Third party providers that are not our company collect and process the data necessary to perform their services. These third parties have their own privacy policies with respect to the information we provide them for transaction processing purposes. We encourage you to read these privacy policies in order to understand how these third-party providers process your information. In particular, please note that certain third-party providers do not have a registered office or server in the United States, or in your jurisdiction. As such, if you choose to use a third-party payment method, your data, and the processing thereof, may be governed by the law of that third-party provider.

If you leave this Site or are redirected to a third-party website, your use of the internet will no longer be subject to our Privacy Policy and Terms of Service.

We may share your Personal Information with third parties to help us use your Personal Information, as described above.

Finally, we may also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect and enforce our rights.

As described above, we may use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt out of targeted advertising at any of the links below:

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

Lastly, to the extent you receive any direct mail you can opt out of this by visiting the Direct Marketing Association at: <https://dmachoice.thedma.org/>.

## DO NOT TRACK

Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser. You can learn more about Do Not Track at <https://allaboutdnt.com>.

## SENSITIVE DATA

We do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## CHILDREN

Our services are generally not directed to children under 13. We do not knowingly collect Personal Information from anyone under 18 without parental consent. If you become aware that we have collected Personal Information from a child under the age of 18 without parental consent, please let us know so we can take appropriate action.

## CALIFORNIA RESIDENTS

If you are a California resident and have provided us with your Personal Information, you may ask us to refrain from sharing your Personal Information with third parties, including our affiliates if they are separate legal entities, for direct marketing purposes. Please tell us your preference by contacting us via the contact information in the “Contact Us” section of this Privacy Policy.

## HOW WE PROTECT PERSONAL INFORMATION

In proportion to the sensitivity of the information, we maintain reasonable administrative, technical, and/or physical safeguards and appropriate security measures to protect Personal Information from loss, misuse or unauthorized access, disclosure, alteration, or destruction of the information you provide. However, we cannot guarantee the security of your Personal Information, as no electronic data transmission or storage of information is

completely secure. If an incident is reported affecting your information, we will investigate and comply with all required reporting obligations.

## **PERSONAL INFORMATION SUBJECT TO THE GDPR**

*This section applies to you only if your Personal Information is subject to the Regulation (EU) 2016/679 (General Data Protection Regulation).*

We collect your Personal Information in the manner described in the “Personal Information We Collect” section above.

We use your Personal Information for the purposes described in the “How We Use Your Personal Information” section above. However, use of your Personal Information will be limited (i) to entering into or fulfilling contracts with you, (ii) to the legitimate purposes described in the “How We Use Your Personal Information” that are not overridden by your rights, and (iii) to comply with our legal obligations.

If you do not disclose your Personal Information, it may prevent our ability to enter into a contract with you.

We share your Personal Information in order to carry out your requests, to make various features, services and materials available to you through the services, to respond to your inquiries, and for other purposes described in the “How We Use Your Information” section of this Privacy Policy. We may share your Personal Information or usage information with third parties that perform functions on our behalf (or on behalf of our partners), such as companies or individuals that: host or operate our Site; analyze data; provide customer service; mail products or manage payments; or other third parties that assist with risk management, compliance, legal and audit functions. These service providers are not authorized by us to use or disclose the information except as

necessary to perform services on our behalf or comply with legal requirements.

We may present you with the opportunity to opt in to receive information or marketing offers from third parties or to otherwise consent to the sharing of your information with third parties. If you agree to have your Personal Information shared, your Personal Information will be disclosed to the third-party subject to the privacy notice and business practices of that third party. If, at any time thereafter, you wish to withdraw your consent to our sharing, please contact us via the contact information provided in the “Contact Us” section of this Privacy Policy.

You may have certain rights regarding your Personal Information, subject to local law. We are a United States based company. Your Personal Information will be transferred outside of Europe, including to the United States and Canada. Your Personal Information will only be retained for as long as necessary to achieve the purposes for which it was collected.

## **WEB BEACONS; PIXELS**

A web beacon is an electronic image, often invisible, placed on a Site or in an email, usually no larger than 1 x 1 pixel, which observes the online behavior of visitors on the Site or while sending emails. Web beacons are provided by third parties, Pixels are effectively JavaScript that is copied onto pages of our Site. When a user visits a page with JavaScript, it triggers an image call to a third-party server. Because of the image call, the third-party responds with returning a one-pixel image (hence the name pixel) and drops a cookie on the user’s device. That cookie is the basis for any subsequent tracking by the third-party. We currently use web beacons and pixels with the following third-party partners: Facebook, Twitter and LinkedIn.

## USE OF GOOGLE ANALYTICS FOR WEB ANALYTICS

This Site may use Google Analytics, a web analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ([www.google.com](http://www.google.com)). Google Analytics uses methods enabling analysis of your use of the Site, such as “cookies”, text files stored on your computer. Hereby, data regarding geographic location, language settings, internet browser, internet service provider, operating systems, screen resolution, device type, gender, age, personal interest, online behavior on the Site, are collected by Google LLC and may be used by us, in the form of statistics for the purpose of improving our products, marketing activities, website and its functioning. The information used by us in this context, does not permit any conclusion in respect of the identity of a concerned individual person.

Further details on the collection of data, their processing and use by Google LLC as well as your rights and setting options in context with your privacy are provided in the respective Privacy Policy available at <https://policies.google.com/privacy>.

The information generated about your use of this Site is usually transmitted to a Google server in the United States and stored there. By activating the IP anonymization on this Site, the IP address used will be abbreviated prior to transmission within European Union member states or other states contracting to the Agreement on the European Economic Area. The anonymized IP address provided by Google Analytics within the Google Analytics framework will not be amalgamated with other Google data.

You can prevent Google’s collection of data generated by the cookie and related to your use of the Site (including your IP address), as well as Google’s processing of this data, by downloading and installing the browser plug-in available at: <https://tools.google.com/dlpage/gaoptout?hl=en>.



The relation to Google LLC is based on the European Commission's implementing Decision (EU) 2016/1250 of 12 July 2016 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequacy of the protection provided by the EU-U.S. Privacy Shield (see <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

The data processing is based on the legal provisions in Art. 6 (1) (f) GDPR (legitimate interest).

## **USE OF FACEBOOK PIXEL FOR WEB ANALYSIS**

With respect to Facebook, Inc., located at 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"), in addition to web beacons and pixels, we may use "Custom Audience Pixel" analysis software to optimize our advertising campaigns. This software enables online behavior to be observed in terms of time, geographic location, purchase behavior and use of this Site. This information is collected via web beacons and/or cookies. The information received from the web beacons and/or cookies is anonymous and will not be linked to personal data. This information will not be shared with third parties for their own use. Further information can be found at: <https://en-gb.facebook.com/business/learn/facebook-ads-pixel>.

The relation to Google Analytics is based on the European Commission's implementing Decision (EU) 2016/1250 of 12 July 2016 pursuant to the Directive 95/46/EC of the European Parliament and of the Council on the adequacy of the protection provided by the EU-U.S. Privacy Shield (see <https://www.privacyshield.gov/participant?id=a2zt00000000GnywAAC&status=Active>).

The data processing is based on the legal provisions in provisions in Art. 6 (1) (f) GDPR (legitimate interest).

## USE OF FACEBOOK PLUGINS

Our Site may use social plugins of the Facebook social network, operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA (“Facebook”). The plugins are identified by a Facebook logo or the addition of “Facebook Social Plugin”.

If you visit a page on our Site that contains this plugin, your browser connects directly to the Facebook servers. The content of the plugin is transmitted by Facebook directly to your browser and integrated into the page. Through this integration, Facebook receives the information that your browser has accessed on the corresponding page of our Site, even if you do not have a Facebook profile or are not currently logged in to Facebook. This information (including your IP address) will be transmitted from your browser directly to a Facebook server in the United States and stored there.

If you are logged in to Facebook, Facebook can immediately attribute your visit to our Site to your Facebook profile. If you interact with the plugins by clicking the “Like” button or by leaving a comment, for example, the corresponding information is also transmitted directly to a Facebook server, and stored there. The information may also be posted on your Facebook profile and displayed to your Facebook friends.

The purpose and scope of the data collection and the further processing and use of the data by Facebook, as well as your rights and setting options for the protection of your privacy can be found in the Facebook privacy policy, at <http://www.facebook.com/policy.php>.

If you do not wish Facebook to directly assign the data collected via our Site to your Facebook profile, you must log out of Facebook before visiting our Site. You can also completely prevent the loading of Facebook plugins with add-ons for your browser, such as a “Facebook Blocker” or script blocker, for example.

## USE OF LINKEDIN PLUGINS

On our Site we may use the analysis and conversion tracking technology of the LinkedIn platform, LinkedIn Corporation, 1000 W. Maude Ave., Sunnyvale, California 94085, USA. With this LinkedIn technology, you can see more relevant advertising based on your interests. We also may receive aggregated (summarized in a certain way) and anonymous reports from LinkedIn about ad activity and information about how you interact with our Site. We also may embed a plugin, in which case LinkedIn receives the information that you have accessed our website from your IP-address. Please note that the information is exchanged when you visit our Site, regardless of whether or not you interact with the plugin.

For more information on LinkedIn's privacy policy, please visit: <https://www.linkedin.com/legal/privacy-policy#choices-oblig>. You may object to the above-described analysis of your usage behavior by LinkedIn and the display of interest-based recommendations. Click on the field 'Opt out on LinkedIn' (for LinkedIn members) or 'Opt out' (for other users) under the following link: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

LinkedIn guarantees compliance with an appropriate level of data protection by participating in the Privacy Shield program. LinkedIn also complies with certain legal frameworks relating to the transfer of data, such as the EU-US and Swiss-US Privacy Shield Frameworks and European Commission approved standard contractual clauses. You may read more about LinkedIn's policies with respect to Privacy Shield at <https://www.linkedin.com/help/linkedin/answer/83459/linkedin-s-privacy-shield-statement?lang=en>.

## **USE OF TWITTER PLUGINS (E.G. THE “TWEET” BUTTON)**

Our Site may use social plugins of the Twitter microblogging service, operated by Twitter Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, USA (“Twitter”). The plugins are identified by a Twitter logo, in the form of a blue “Twitter bird”, for example.

If you visit a page on our Site that contains this plugin, your browser connects directly to the Twitter servers. The content of the plugin is transmitted by Twitter directly to your browser and integrated into the page. Through this integration, Twitter receives the information that your browser has accessed the corresponding page of our Site, even if you do not have a Twitter profile or are not currently logged in to Twitter. This information (including your IP address) is sent from your browser directly to a Twitter server in the United States and stored there.

If you are logged in to Twitter, Twitter can immediately attribute your visit to our Site to your Twitter account. If you interact with the plugins by clicking on the “Tweet” button, for example, the corresponding information is also transmitted directly to a Twitter server and stored there. The information will also be posted on your Twitter account and displayed there to your contacts.

The purpose and scope of the data collection and the further processing and use of the data by Twitter, as well as your rights and setting options for the protection of your privacy can be found in Twitter’s privacy policy, at <https://twitter.com/privacy>.

If you do not wish Twitter to directly assign the data collected via our Site to your Twitter profile, you must log out of Twitter before visiting our Site. You can also completely prevent the loading of Twitter plugins with add-ons for your browser, such as a script blocker, for example.

## USE OF PINTEREST PLUGINS

Our Site may use social plugins of the Pinterest social network, operated by Pinterest Inc., 651 Brannan Street, San Francisco, CA 94103, USA (“Pinterest”). The plugins are identified by a Pinterest logo.

If you visit a page on our Site that contains this plugin, your browser connects directly to the Pinterest servers. The content of the plugin is transmitted by Pinterest directly to your browser and integrated into the page. Through this integration, Pinterest receives the information that your browser has accessed the corresponding page of our Site, even if you do not have a Pinterest profile or are not currently logged in to Pinterest. This information (including your IP address) is sent from your browser directly to a Pinterest server in the USA and stored there.

If you are logged in to Pinterest, Pinterest can immediately attribute your visit to our Site to your Pinterest account. If you interact with the plugins by clicking on the “Pin it” button or by leaving a comment, for example, the corresponding information is also transmitted directly to a Pinterest server, and stored there. The information will also be posted on your Pinterest account and displayed there to your Pinterest followers.

The purpose and scope of the data collection and the further processing and use of the data by Pinterest, as well as your rights and setting options for the protection of your privacy can be found in the Pinterest privacy policy, at <https://policy.pinterest.com/en/privacy-policy>.

If you do not wish Pinterest to directly assign the data collected via our Site to your Facebook profile, you must log out of Pinterest before visiting our Site. You can also completely prevent the loading of Pinterest plugins with add-ons for your browser, such as a script blocker, for example.

## **USE OF VIMEO**

Our Site may use features provided by the Vimeo video portal. This service is provided by Vimeo Inc., 555 West 18th Street, New York, New York 10011, USA.

If you visit one of our pages featuring a Vimeo plugin, a connection to the Vimeo servers is established. Here the Vimeo server is informed about which of our pages you have visited. In addition, Vimeo will receive your IP address. This also applies if you are not logged in to Vimeo when you visit our plugin or do not have a Vimeo account. The information is transmitted to a Vimeo server in the United States, where it is stored.

If you are logged in to your Vimeo account, Vimeo allows you to associate your browsing behavior directly with your personal profile. You can prevent this by logging out of your Vimeo account.

For more information on how to handle user data, please refer to the Vimeo Privacy Policy at <https://vimeo.com/privacy>.

## **CHANGES**

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons.

## **RIGHTS REGARDING YOUR PERSONAL DATA AND CONTACT OPTIONS**

You have the right to information and data portability, free of charge, on the personal data stored by us, as well as a right to have this data corrected, deleted or if necessary, restrict their use. For questions on the collection, processing or use of your personal data, the exercise of the above-mentioned rights as well as

withdrawal of consent granted or objection to a particular use of data, please contact us directly via email at [privacy \[at\] twowolvesmedia.com](mailto:privacy@twowolvesmedia.com).

### **Right to erasure ('right to be forgotten')**

Pursuant to Art. 17 GDPR, you can request the immediate deletion of your personal data stored by us. We are obliged to delete personal data including if (i) it is no longer necessary for the purposes for which it is being processed, (ii) there is no legal basis for the processing, (iii) you have objected to the processing and if there are no overriding legitimate reasons for the processing, (iv) the personal data was being processed unlawfully or (v) the deletion is necessary to fulfill a legal obligation.

### **RESTRICTION**

Pursuant to Art. 18 GDPR, you have the right to demand the restriction of the processing of your personal data where one of the following applies: (i) the accuracy of the data is disputed by you, (ii) the processing is unlawful, yet you reject its deletion, (iii) we no longer need the data, but you still need the data to assert, exercise or defend legal claims, or (iii) you have objected to processing pursuant to Art. 21 GDPR.

### **Data portability**

Pursuant to Art. 20 GDPR you have the right to receive your personal data provided and processed automatically by us on the basis of your consent (or for contract fulfillment) in a structured, current and machine-readable format and to request transmission to another data controller.

## **Revocation**

Pursuant to Art. 7 (3) GDPR, you can revoke your consent provided to us at any time. As a result, we are no longer allowed to continue processing data based on this consent in the future.

## **Right to Object or Complaint**

*Pursuant to Art. 21 GDPR, you have the right, for reasons arising from your particular situation, to object at any time to the processing of personal data concerning you, which may be processed on the basis of Art. 6 (1) (e) or (f) GDPR; the same applies to profiling based on these provisions. We will no longer process your personal data after your objection, unless we can prove compelling grounds for processing that outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims. If an objection relates to the processing of personal data for direct marketing purposes, it will no longer be processed for these purposes.*

## **Right to file complaints with regulatory authorities**

Pursuant to Art. 77 GDPR any data subject has the right to lodge a complaint with a data protection supervisory authority in the country of such individual's habitual residence or place of work, or of the believed breach of the GDPR. A list of the data protection supervisory authorities can be found at [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).

## **CONTACT US**

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at [privacy \[at\] twowolvesmedia.com](mailto:privacy@twowolvesmedia.com) or by mail using the details provided below:



Two Wolves Media

Attn: Privacy Manager

215 S Main St, #1424

Marion, NC 28752

United States