

## Thirty-One Gifts LLC - Privacy Policy

This Privacy Policy is intended to assist you in understanding what personal information we gather about you when you visit Thirty-One Gifts online, how we use and share that information, and the safeguards we have in place for the information. It also covers our use and sharing of personal information collected through our Canadian websites, through mobile applications downloaded in Canada or personal information otherwise collected in Canada.

The terms “Thirty-One Gifts,” “us,” “our” or “we” refer to Thirty-One Gifts LLC and, with respect to Canadian, these terms refer to Thirty-One Gifts Canada Inc.

**Scope.** This Privacy Policy covers all of our websites in the U.S. and Canada and any mobile versions of these websites (our "Websites") and applications created by Thirty-One Gifts that are available for U.S. and Canadian consumers through various mobile devices (our “Mobile Applications”) that expressly adopt, and display or link to, this Privacy Policy. The term "Marketing Channels" is used in this policy to refer to both our Websites and Mobile Applications and in Canada also includes your interactions with us at Thirty-One Gifts parties or events, and by telephone, mail and email. The terms “you” and “your” refer to a consumer user or viewer of our Marketing Channels. By using or accessing our Marketing Channels, you agree to this Privacy Policy.

## What information do we collect online and how is it used?

### Personal Information:

We may ask you to provide personal information through our Marketing Channels. For example, when you:

- subscribe to receive our email or other communications;
- complete a request to host a party event;
- participate in a survey;
- enter contests or sweepstakes;
- place an order with us online or through one of our independent Thirty-One Gifts Consultants;
- fill out an application to become an independent Thirty-One Gifts Consultant;
- fill out a request for support of a non-profit organization through Thirty-One Gives; or
- contact us for other information.

In addition, independent Thirty-One Gifts Consultants may provide us personal information about individuals who are invited to hosted Thirty-One Gifts parties.

Types of personal information collected or provided may include your name, address, email address, home, work and mobile telephone number, payment information, as well as other information you chose to provide which can identify you personally.

Once we receive personal information through our Marketing Channels, we use it for such things as:

- processing orders and requests;
- improving, developing, and marketing our products and services, Websites and Mobile Applications;
- communicating with you via email, telephone or postal mail regarding promotional offers, new products, and other information that we think may be interesting to you;
- internal business purposes, such as analyzing your activity with us, including your interaction with our Marketing Channels and your purchases;
- personalizing our communications to you and allow you to communicate and interact with others on our Websites and Mobile Applications;
- helping you find an independent Thirty-One Gifts Consultant including automatically assigning a new independent Thirty-One Gifts Consultant to you and sharing your personal information with that person if your current independent Thirty-One Gifts Consultant has discontinued selling Thirty-One Gifts and has become inactive in the business;
- facilitating the business activities of an independent Thirty-One Consultant.
- responding to your inquiries;
- conducting surveys, sweepstakes or contests (please note some of these activities have additional rules, which could contain additional information about how we use and disclose your personal information, we recommend you read those rules carefully);
- considering your application to become an independent Thirty-One Gifts Consultant.

Information Observed or Collected Through Technology.

what type of technologies are used?

We and our third party service providers use technology to automatically observe and collect information whenever you interact with our Websites or Mobile Applications and when you open our emails. The following describe some of the types of technology used:

- **Navigational Information.** We collect navigational information such as browser type and version; the service provider used to access our

Websites or Mobile Applications; whether visitors arrived through a link for our Websites; and for visitors using a mobile version of our Websites or a Mobile Application, technical information about the device used, such as screen size, cookie support by the device and how images may appear.

- **Cookies.** Cookies assign a unique identification to your computer and are typically stored on your computer's hard drive by your web browser.
- **Pixel Tag.** A pixel tag (also known as Web beacons, Web bugs and clear GIFs) is a nearly invisible small graphic image on a webpage or in an email message.

how do we use information gathered through technology?

Information gathered through technology allows us to determine such things as which parts of our Websites are most visited or used, what products are browsed and/or purchased, the effectiveness of our Websites, possibly the city from which devices connect to our Websites, and difficulties visitors may experience in accessing our Websites. Cookies are also used to associate you with your independent Thirty-One Gifts Consultant, keep track of items you put into your shopping cart, and to tell us whether you have visited our Websites in the past. Pixel tags in emails help us confirm the receipt of, and response to, our emails.

What information do we share with third parties?

We will share your personal information with our affiliates. In addition, we will share your personal information with the independent Thirty-One Gifts Consultants(s) with whom you indicate you have a relationship, as well as with any other independent Thirty-One Gifts Consultant(s) we assign to you if your current independent Thirty-One Gifts consultant has discontinued selling Thirty-One Gifts and has become inactive in the business. If you have never had a relationship with one of our independent Thirty-One Gifts Consultants, we will select one who is located near you and provide your contact information to that independent Thirty-One Gifts Consultant so you may be contacted about your inquiry.

We may share your personal information with third party service providers that assist us in such things as: developing and administering our Websites or Mobile Applications; data analysis; payment processing; order fulfillment; infrastructure provision; information technology services; customer service; auditing; training; allow us to pursue available remedies or limit the damages we may sustain; conducting surveys, sweepstakes or contests; sending and administering emails or text messages; performing marketing services; or other similar services. (These third party providers will be supplied with, or have access to, your personal information for the purpose of providing these services to us or on our behalf.)

If we were ever merged with or acquired by another company or sold substantially all of our assets, or if we acquire another business entity or substantially all of its assets or

we are involved in a corporate reorganization or other change of control, some or all of the personal information collected about you could be shared with this entity, and it may also be retained by us.

We will not otherwise share, sell, distribute, or lease your personal information to third parties unless we have your permission or are required by law to do so or based on our good faith belief that it is necessary to conform or comply with the law or is necessary to protect our business, the users of our Marketing Channels, the Marketing Channels or the public.

Nothing in this policy restricts our ability to share aggregated or anonymized information that does not directly identify you.

## What choices do you have over how your information is used?

**Marketing Email:** You may elect to no longer receive marketing emails from us or that we send on behalf of one of our independent Thirty-One Gifts Consultants. You may opt out of these marketing emails by following the unsubscribe instructions in any marketing email you receive. You may also adjust your preferences on our [Email Subscription Center](#). Please be aware, however, even if you opt out of marketing emails, you may still receive emails related to your transactions, such as order confirmations and may still receive emails directly from your independent Thirty-One Gifts Consultants that we do not send on behalf of the Consultant.

**Text Message Marketing:** If you no longer want to receive text messages from us, you can follow the opt-out instructions provided at the time you sign up for text messages or the instructions that may be included in the text messages you receive.

## What is our policy regarding children?

We do not sell products for purchase by children. Our Marketing Channels are directed to adults and are not directed to children under the age of 13. The Company does not knowingly collect personally identifiable information from anyone under the age of 13.

## How can you update your personal information?

If you believe that any information we have collected about you is incorrect or incomplete, then please email or write to our Privacy Manager at the contact information below, letting us know the correct information.

## How will we update our Privacy Policy?

We reserve the right to modify or amend this Privacy Policy at any time and for any reason. If we ever change our Privacy Policy, then we will post the new policy on this page so that you are always aware of the information that we collect, how we use it, and under what circumstances we disclose it. Should there be a material change to our

Privacy Policy, it will be applied only to the information we collect after the effective date of the change.

## How do we protect your information?

Our Online Channels use the following types of security measures: firewall technology, limited access servers, and when you place an order online, we require use of Web browsers that permit communication through Transport Layer Security (TLS) technology. TLS is encryption technology that provides security for information as it is being sent over the Internet. **Browsers and devices must support TLS 1.0 or newer to access secure areas of our website.**

## Where should you direct your questions or concerns?

If you have questions or concerns with respect to our Privacy Policy, please feel free to contact our Privacy Manager at [privacy@thirtyonegifts.com](mailto:privacy@thirtyonegifts.com) or via regular mail at:

Privacy Manager  
Thirty-One Gifts, LLC  
3425 Morse Crossing  
Columbus, OH 43219  
US

## What additional provisions apply to personal information collected in Canada?

### Consent

By providing us personal information and using our Marketing Channels, you consent to the collection, use, and disclosure of information in accordance with the terms of this Privacy Policy.

### How can you access your personal information?

We will make reasonable efforts to ensure that the personal information we collect, use and share is accurate and complete. If you would like to review your personal information, or you believe that any information we are holding on you is incorrect or incomplete, then please contact our Privacy Manager using the contact information above.

### Where is personal information stored and processed?

We store and process personal information in the United States. Our third party service providers may also store and process your personal information in the United States and other countries. Such personal information may be subject to disclosure under the laws of these countries. If you have questions about this processing or storage outside of Canada, please contact our Privacy Manager at the address above.

Additional choices of how your information is used.

Postal or Telephone Marketing: If you do not wish to receive marketing materials directly from Thirty-One Gifts via regular postal mail or through telephone calls/messages directly from Thirty-One Gifts, please email us at [privacy@thirtyonegifts.com](mailto:privacy@thirtyonegifts.com) or mail the Privacy Manager at the address listed above and tell us to remove you from our postal mailing and/or the phone marketing list. Even if you opt out of these postal mailings or phone marketing made directly by Thirty-One Gifts, you may still receive postal mailings and phone calls from your independent Thirty-One Gifts Consultants.

Disclosure to Affiliates: If you would like to make sure that we do not disclose your personal information to our affiliates, please email us at [privacy@thirtyonegifts.com](mailto:privacy@thirtyonegifts.com) or mail the Privacy Manager at the address listed above and tell us that you do not want us to disclose your personal information to our affiliates.

## What additional provisions apply only to independent Thirty-One Gifts Consultants?

In addition to the foregoing provisions of this Privacy Policy, the following provisions are applicable only to independent Thirty-One Gifts Consultants:

This Privacy Statement applies to the Personal Information of independent Consultants collected by Thirty-One Gifts, whether collected online or offline. This information would be collected in addition to any Personal Information we may collect from you as a Thirty-One Gifts customer, as described above.

If you seek to become a Thirty-One Gifts Consultant, we may collect and use your personal information including credit-related information, your social security number, and your birthdate to determine your eligibility and to conduct business once you have become a Thirty-One Gifts Consultant.

In order to become a Thirty-One Gifts Consultant, you will be required to enter into a separate agreement with Thirty-One Gifts ("Independent Sales Consultant Application and Agreement"). If you have entered into the Independent Sales Consultant Application and Agreement, we may collect, use and disclose your personal information in accordance with this Privacy Statement and the terms of your Independent Sales Consultant Application and Agreement. We also may collect, use and disclose your personal information as necessary to fulfill our obligations under the Independent Sales Consultant Application and Agreement. In the event of a conflict between this Privacy Policy and the Independent Sales Consultant Application and Agreement, the terms of the Independent Sales Consultant Application and Agreement shall apply.

Once you are a Thirty-One Gifts Consultant, we may disclose your personal information:

- to other Consultants or leaders, who may be independent contractors to Thirty-One Gifts;

- as part of our sales leadership program, to Thirty-One Gifts Consultants who are sales leaders;
- to current and potential customers who are seeking the assistance of a Thirty-One Gifts Consultant; and
- as necessary to comply with legal requirements such as tax and record keeping obligations.

We may also combine the non-personal information that we and our third-party service providers collect about your use of our Website (as described above) with your unique Consultant number or personal information. We may use the combined information for purposes such as to analyze Thirty-One Gifts Consultant use of our Websites, in order to evaluate and make improvements to our business model, and for other internal analytics purposes.

*This Privacy Policy is effective July 18, 2016.*