Global Rose - Privacy Policy

Introduction

This Privacy Policy describes how Global Rose and its subsidiaries and affiliates ("Global Rose", "we", "us" or "our") collect, use, store, and share your information when:

- 1. You access and/or use our website and any other digital properties we own, including www.globalrose.com; (Websites").
- 2. When you use our products and services ("Services")
- 3. When you communicate with us in any manner, including by email or telephone ("Communications")
- 4. When we interact with certain third parties.

1. What Type Of Information Do We Collect?

Depending on how you interact with our Websites and Services, the nature of our Communications, and how we may interact with certain third party partners, we may collect the following information from and about you:

- **Basic Identifying Information.** Information you provide such as your full name, postal address, e-mail address, phone number, account name, username, and other similar identifiers.
- Device Identifier and other Unique Identifiers. Information such as your device identifier, internet protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifier, and other unique identifiers.
- Internet or Other Network Activity. Information such as your browsing or search history, and other information regarding your interactions with our Websites, emails, and advertisements.
- **Geolocation Data.** Information that permits us to determine your location so that we can determine how best to receive our Services.
- **Commercial Information.** Information such as the nature of the Services you've considered, and related information.
- **Business Information.** Information such as the name of your business, account, and related information.
- **Demographic Information.** Information such location of the device (cell phone or computer).

- **User Content.** Information such as your Communications with us and any other content you provide, such as social media profiles, photographs of receipts, images, videos, survey responses, comments, product reviews, testimonials, and other content.
- Audio and Visual Information. Information such as photographs, images, videos, and recordings of your voice (such as when we record customer service calls for quality assurance).
- **Inferences.** Information such as inferences drawn from or created based on the information identified above.

2. How Do We Collect Your Information?

We collect your information in three ways: (1) directly from you when you use our Websites, engage with our Services, or Communicate with us; (2) automatically using online technologies when you engage with our Websites, Services, and Communications; and (3) from our third party partners.

- **Directly from you.** We collect information directly from you when you enter your information on our Websites, sign-up for an account with us, access our content, take a survey or a poll or enter a contest, use our Websites and Services, engage in Communications with us, or sign-up to receive emails, text messages, or certain other Communications from us.
- Automatically Using Online Technologies. When you visit our Websites, open or click on emails we send you or related Communications, or interact with our advertisements, we or other third parties may automatically collect certain information about you using online tracking technologies such as cookies, pixels, web beacons, software developer kids, and related technologies. For more information, see Cookies and Similar Online Tracking Technologies below.
- From Our Partners. We collect information from our third party partners, such as brands, data analytics providers, marketing or advertising providers, fraud prevention service providers, and vendors that provide services.

3. Cookies and Related Online Tracking Technologies

We and our third-party partners use cookies, pixels, web beacons, software development kits, and other similar online tracking technologies to gather information about you when you use our Websites, interact with some of our Products, and engage with our Communications. Some of the online tracking technologies are used to maintain the security of our Websites, manage your account, prevent crashes, fix bugs, save your preferences, assist with basic Website functions, advertising, analytics, and other performance functions.

Our Websites use Google Analytics for analytics purposes. You can learn more about Google Analytics by vising How Google uses information from sites or apps that use our services.

4. How Do We Use Your Information?

We use your information for a variety of purposes, including to:

- **Provide our Websites and Services to You.** We use your information to provide our Websites and Services to you, including to: (1) create and manage your account when you sign-up to use our Services; (2) facilitate your access and use of our Websites; (3) send you notifications relating to your account and participation in our Services; (4) answer your Communications; and (5) perform other related business functions.
- **Communicate with You.** We use your information to engage in Communications with you, such as to respond to your requests, inquiries, issues, feedback, and to provide customer service.
- Market and Advertise. We use your information for marketing and advertising purposes, including sending marketing, advertising, and promotional communications to you by email, text message, or postal mail. We also use your information to show you advertisements for Services and to administer our sweepstakes and other contests.
- **Conduct Analytics and Personalization.** We use your information to conduct research and analytics, including to improve our Websites and Services. We also use your information to understand your interaction with our Websites, advertisements, Services, and

our Communications with you. We also use your information to personalize your experience, to save you time when you visit our Websites and use our Services, to better understand your needs, and to provide personalized recommendations for our Services.

- Security and Fraud Prevention. We use your information to detect, investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions. We also use your information to enforce our terms and procedures, prevent against security incidents, and prevent harm to other users of our Services.
- Legal Obligations. We use your information to comply with our legal and regulatory obligations, to establish and exercise our rights, and to defend against legal claims.
- **Business Functions.** We use your information to support our core business functions, including to maintain records related to business management, loss prevention, collecting amounts owed, and identifying and repairing errors or problems in the Websites.

5. How Do We Disclose Your Information?

We may disclose or share your information with affiliated and nonaffiliated third-parties, including:

- With your Consent. We may disclose or share your information with your consent, which may be obtained in writing; online, through "click-through" agreements; when you accept the terms of use on our Websites; orally, either in person or on the phone; or by other means.
- In a Business Transfer. We may disclose or share your information as part of a corporate business transaction, such as a merger or acquisition, joint venture, corporate reorganization, financing, or sale of company assets, or in the unlikely event of insolvency, bankruptcy, or receivership, in which such information could be transferred to third parties as a business asset in the transaction.
- **To Non-Affiliated Third Parties.** We may disclose or share your information with certain non-affiliated third parties to facilitate your access and use of our Websites, our Services, and to provide us with certain business functions, including but not limited to sharing your information with brand partners, internet service providers, advertising networks, data analytics providers, governmental entities, operating systems and platforms, social

medial networks, and service providers who provide us a service (e.g., customer service, auditing, marketing, debugging to identify and repair errors that impair existing intended functionality on our Websites, and/or protecting against malicious, deceptive, fraudulent, or illegal activity).

• For Legal Process And Protection. We may disclose or share your information to satisfy any law, regulation, legal process, governmental request, or where we have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to: (1) enforce or apply our agreements; (2) protect our interests, property, or safety of others; (3) in connection with claims, disputes, or litigation; and (4) to protect our Websites.

6. How Do We Protect Your Information?

Although no system can guarantee the complete security of your information, we take all commercially reasonable steps to ensure your information is protected in alignment with all applicable laws and regulations, as appropriate to the sensitivity of your information.

7. How Long Do We Keep Your Information?

We keep your information for as long as is necessary in accordance with the purpose for which it was collected, our business needs, and our legal and regulatory obligations. If we dispose of your information, we will do so in a way that is secure and appropriate to nature of the information subject to disposal.

8. Links To Third Party Sites

Our Websites and Services may contain links to third party websites and services. Please note that these links are provided for your convenience and information, and the websites and services may operate independently from us and have their own privacy policies or notices, which we strongly suggest you review.

9. Do Not Track

Our Websites may, from time to time, collect information about your online activities, over time and across our different websites. When you use our Websites, third parties may also collect information about your online activities, over time and across different internet websites, online or cloud computing services, online applications, or mobile applications. Some browsers support a "Do Not Track" feature, which is intended to be a signal to websites that you do not wish to be tracked across different websites you visit. Our Websites do not currently change the way they operate based upon detection of a "Do Not Track" or similar signal.

10. Your Rights

• Manage Communication Preferences. You can stop receiving promotional e-mails at any time by clicking on the "unsubscribe" link at the bottom of any promotional e-mail you receive from us.

11. Children

Our Websites and Products are not intended for children under the age of 13. This includes any links to other websites that we provide for our convenience. We don't knowingly collect the information of children under 13 for any reason.

12. Changes To Our Privacy Policy

We may change this Policy from time to time. Any and all changes will be reflected on this page, and where appropriate provided in person or by another electronic method. The effective date will be stated at the top of this Policy. You should regularly check this page for any changes to this Policy.

13. Accessibility

To print a copy of this Privacy Policy, please click here: <u>Privacy Policy</u>.

14. Contact Us

Contact us by clicking on the following link: Contact us