

SINGLE GIRL CLUB

Privacy Policy

Updated: December 8th, 2021

This Privacy Policy. This “Privacy Policy” describes the privacy practices of Single Girl Club, LLC and our subsidiaries and affiliates (collectively, “Single Girl Club”, “we”, “us”, or “our”) in connection with the www.SingleGirlClub.com website and which posts or links to this Privacy Policy (collectively, the “Service”), and the rights and choices available to individuals with respect to their information.

Questions; Contacting Single Girl Club; Reporting Violations. If you have any questions, concerns or complaints about our Privacy Policy or our data practices, or if you want to report privacy or security violations to us, please contact us at [Hello@singlegirlclub.com](mailto>Hello@singlegirlclub.com).

Cookies. You can find out how we and our partners may use cookies by visiting our [Cookie Policy](#).

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Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- Contact information, such as your first and last name and email.
- Profile information, such as your username and password that you may set to establish an online account with us, your photograph, interests, and preferences.
- Registration information, such as information that may be related to a service, an account or an event you register for.
- Feedback or correspondence, such as information you provide when you contact us with questions, feedback, or otherwise correspond with us online.
- Demographic Information, such as your city, state, country of residence, postal code, and age.
- Payment information, all information necessary to complete orders you place on the Service, such as your name, credit card information, billing information and shipping information.
- Transaction information, such as information about payments to and from you and other details of products or services you have purchased from us.
- Usage information, such as information about how you use the Service and interact with us, including information associated with any content you upload to the websites or otherwise submit to us, and information you provide when you use any interactive features of the Service.

- Marketing information, such as your preferences for receiving communications about products sold via our Service, and our activities, events, and publications, and details about how you engage with our communications.
- Other information that we may collect which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

Information we obtain from social media platforms. We may maintain pages for our Company on social media platforms, such as Facebook, LinkedIn, Twitter, Google, YouTube, Instagram, Tiktok, and Pinterest and other third party platforms. When you visit or interact with our pages on those platforms, the platform provider's privacy policy will apply to your interactions and their collection, use and processing of your personal information. You or the platforms may provide us with information through the platform, and we will treat such information in accordance with this Privacy Policy.

Information we obtain from other third parties. We may receive personal information about you from third-party sources where they have a right to provide us with this information. We may also obtain your personal information from other third parties, such as marketing partners, and publicly-available sources.

Cookies and Other Information Collected by Automated Means

We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and activity occurring on or through the Service. The information that may be collected automatically includes your computer or mobile device operating system type and version number, manufacturer and model, device identifier (such as the Google Advertising ID or Apple ID for Advertising), browser type, screen resolution, IP address, the website

you visited before browsing to our website, general location information such as city, state or geographic area; and information about your use of and actions on the Service, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access. Our service providers and business partners may collect this type of information over time and across third-party websites and mobile applications.

On our webpages, this information is collected using cookies, browser web storage (also known as locally stored objects, or “LSOs”), Flash-based LSOs (also known as “Flash cookies”), web beacons, and similar technologies, and our emails may also contain web beacons.

See our Cookie Policy for more information.

Referrals

Users of the Service may have the opportunity to refer friends or other contacts to us. If you are an existing user, you may only submit a referral if you have permission to provide the referral’s contact information to us so that we may contact them.

How we use your personal information

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

To operate the Service. We use your personal information to:

- provide, operate and improve the Service
- provide information about our products and services
- establish and maintain your user profile on the Service
- send you the products you order on the Service

- enable security features of the Service, such as sending you security codes via email or SMS, and remembering devices from which you have previously logged in
- facilitate social features of the Service, such as by identifying and suggesting connections with other users of the Service and providing chat or messaging functionality
- communicate with you about the Service, including by sending you announcements, updates, security alerts, and support and administrative messages
- communicate with you about events or contests in which you participate
- understand your needs and interests, and personalize your experience with the Service and our communications
- provide support and maintenance for the Service
- to respond to your requests, questions and feedback

For research and development. We analyze use of the Service to analyze and improve the Service and to develop new products and services, including by studying user demographics and use of the Service.

To send you marketing communications. We may send you Single Girl Club-related marketing communications as permitted by law. You will have the ability to opt-out of our marketing and promotional communications as described in the Opt out of marketing section below.

To display advertisements. We work with advertising partners to display advertisements on the Service. These advertisements are delivered by our advertising partners and may be targeted based on your use of the Service or your activity

elsewhere online. To learn more about your choices in connection with advertisements, please see the section below titled “Targeted online advertising”.

To post user testimonials and feedback. We often receive testimonials and comments from users who have had positive experiences with our Service. We occasionally publish such content. When we publish this content, we will identify our users by their first and last name and may also indicate their home city. We obtain your consent prior to posting your name along with the testimonial. We may post user feedback on the Service from time to time. We will share your feedback with your first name and last initial only. If we choose to post your feedback, we will obtain your consent prior to posting your name with your feedback.

To comply with law. We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

For compliance, fraud prevention, and safety. We may use your personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) protect our, your or others’ rights, privacy, safety or property (including by making and defending legal claims); (b) enforce the terms and conditions that govern the Service; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

With your consent. In some cases we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

To create anonymous data. We may create anonymous data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with

third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

How we share your personal information

We do not share your personal information with third parties without your consent, except in the following circumstances or as described in this Privacy Policy:

Our payment processor. For online payments and/or Automated Clearing House (ACH) payouts, we use the payment services of Shopify. We do not process, record or maintain your credit card or bank account information, but we will provide them with your Payment Information to enable them to process your payment for orders on the Service. For more information on how payments are handled, or to understand the data security and privacy afforded such information, please refer to the privacy policy of Shopify, which you can find here – <http://www.shopify.com/legal/privacy>.

Service providers. We may share your personal information with third party companies and individuals that provide services on our behalf or help us operate the Service (such as customer support, hosting, analytics, email delivery, marketing, and database management services). These third parties may use your personal information only as authorized by us.

Disclosure to Third Party Companies. We may enter into agreements with companies to offer co-branded products and/or services via the Service (“Third Party Companies”). Where you purchase these co-branded products and/or services, we may provide your personal information to a Third Party Company where necessary in connection with the purchase or you have consented to us doing so. Because we do

not control the privacy practices of these third party companies, you should read and understand their privacy policies, which we or they will make available to you before we provide your personal information to them.

Third-party platforms and social media networks. If you have enabled features or functionality that connect the Service to a third-party platform or social media network (such as by logging in to the Service using your account with the third-party, providing your API key or similar access token for the Service to a third-party, or otherwise linking your account with the Service to a third-party's services), we may disclose the personal information that you authorized us to share. We do not control the third party's use of your personal information.

Advertising partners. When we use third-party cookies and other tracking tools, we may disclose your personal information to those third-party companies to help us analyze use of the Service, display advertisements on the Service and advertise the Service elsewhere online.

Other Users of the Service and the Public. We may provide functionality that enables you to disclose personal information to other users of the Service or the public. For instance, you may be able to maintain a user profile with information about yourself that you can make available to other users or the public. You may also be able to submit content to the Service (such as comments, reviews, surveys, blogs, photos, and videos), and we will display your name, username, and a link to your user profile along with the content you submit. We do not control how other users or third parties use any personal information that you make available to other users or the public. Once you have posted information publicly, while you will still be able to edit and delete it on our Service, you will not be able to edit or delete such information cached, collected, and stored elsewhere by others (e.g., search engines).

Professional advisors. We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

For compliance, fraud prevention and safety. We may share your personal information for the compliance, fraud prevention and safety purposes.

Business transfers. We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution. In such a case, we will make reasonable efforts to require the recipient to honor this Privacy Policy.

Your choices

In this section, we describe the rights and choices available to all users. Users who are located within the European Union can find additional information about their rights below.

Access or Update Your Information. If you have registered for an account with us, you may review and update certain personal information in your account profile by logging into the account.

Opt out of marketing communications. You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email or by contacting us. You may continue to receive service-related and other non-marketing emails.

Cookies & Browser Web Storage. We may allow service providers and other third parties to use cookies and similar technologies to track your browsing activity over time and across the Service and third party websites (e.g., for ad tailoring or analytics purposes). For more details, see our Cookie Policy.

Targeted online advertising. Users may opt out of receiving targeted advertising on websites through members of the Network Advertising Initiative by clicking [here](#) or the Digital Advertising Alliance by clicking [here](#). European users may opt out of receiving targeted advertising on websites through members of the European Interactive Digital Advertising Alliance by clicking [here](#), selecting the user's country, and then clicking "Choices" (or similarly titled link). Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms linked above.

In addition, your mobile device settings may provide functionality to limit our, or our partners', ability to engage in ad tracking or targeted advertising using the 'advertising ID' associated with your mobile device.

If you choose to opt-out of targeted advertisements, you will still see advertisements online but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online behavioral participate in these opt-out programs, so you may still receive some cookies and tailored advertisements from companies that are not listed.

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

Choosing not to share your personal information. Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Service to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with our services. We will tell you what information you must provide to receive the Service by designating it as required at the time of collection or through other appropriate means.

Other sites, mobile applications and services. The Service may contain links to other websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or online services that are not associated with us. We do not control third party websites or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

Security practices. The security of your personal information is important to us. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfers. We are headquartered in the United States and have service providers in other countries, and your personal information may be transferred to the United States or other locations outside of your state, province, or country where privacy laws may not be as protective as those in your state, province, or country.

European Union users should read the important information provided below about transfer of personal information outside of the European Union.

Children. As a general rule, the Service is not intended for children, they should not use the Service, and we do not collect personal information from them. For these purposes, we define “children” as:

- anyone under 13 years old; and
- anyone under the age in their country of residence, below which their parent or legal guardian needs to consent to our processing of personal information.

If we learn that we have collected personal information of a child without the consent of the child’s parent or guardian as required by law, we will delete it. We encourage parents with concerns to contact us at hello@singlegirlclub.com.

Changes to this Privacy Policy. We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. We may also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail (if you have an account where we have your contact information) or another manner through the Service.

Any modifications to this Privacy Policy will be effective upon our posting the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

Notice to California users

The information provided in this section applies only to California residents. We are required by the California Consumer Privacy Act of 2018 (“CCPA”) to provide California residents with an explanation of how we collect, use and share their personal information, and of the rights and choices we offer California residents regarding our handling of their personal information.

Personal Information that we collect, use and share

The information below describes how we currently collect, use and share personal information, and how we have collected, used and shared the information in the preceding 12 months. Information you voluntarily provide to us, such as in correspondence, may contain other categories of personal information not described below.

Personal information we collect

- Contact information
- Registration information
- Demographic information
- Payment Information
- Transaction information
- Marketing information
- Profile information
- Content you choose to upload
- Usage information
- Device Data

CCPA categories of personal information (Definitions are available [here](#))

- Identifiers
- Commercial Information
- Internet or Network Information
- **Financial Information**
- **Protected Classification Characteristics**
- Commercial Information
- Internet or Network Information

Sources of personal information

- Automatically collected
- **You**
- **Public sources**

Business/commercial purposes for which we may collect and use personal information

Categories of third parties to which we disclose personal information for a business purpose

- To operate the Service
- For research and development
- To send you marketing communications
- To display advertisements
- Advertising partners
- Third-party platforms

Based on our understanding of the term “sell” under the CCPA, we do not “sell” your personal information. We do work with advertising partners like Google to deliver interest-based ads as described above. For information on how you can limit use of your information for interest-based ads, please see our Cookie Policy.

Please note that we may also disclose your personal information to professional advisors, for compliance, or in connection with business transfers.

Under California Civil Code section 1798.83, California residents are entitled to request a notice identifying the categories of personal information that we share with third parties for their own direct marketing purposes, and providing contact information for such third parties. If you are a California resident and would like a copy of this notice, please submit a written request to us via email at hello@singlegirlclub.com. You must put the statement “Your California Privacy Rights” in your request and include your name, street address, city, state, and ZIP code. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

Your California Privacy Rights

California residents have the following rights.

- **Information.** You can request information about how we have collected, used and shared and used your Personal Information during the past 12 months.
- **Access.** You can request a copy of the personal information that we have collected about you in the past 12 months.
- **Deletion.** You can ask us to delete the personal information that we collected or maintained from you.

- **List of Third Party Marketers.** Under California's Shine the Light law, Poosh customers who are California residents may request a notice identifying the categories of personal information that we share with third parties for their own direct marketing purposes, and such third parties' contact information.

You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA. Please note that the CCPA limits these rights by, for example, prohibiting us from providing certain sensitive information in response to an access request and limiting the circumstances in which we must comply with a deletion request. If we deny your request, we will communicate our decision to you.

How to Submit a Request

To request access to or deletion of personal information:

- visit singlegirlclub.com
- email hello@singlegirlclub.com

We will need to verify your identity to process your requests and we reserve the right to confirm your California residency. Government identification may be required. If you wish to designate an authorized agent to make a request on your behalf, we will need to verify both your and your agent's identities and your agent must provide valid power of attorney or other proof of authority acceptable to us in our sole discretion. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it. In certain cases, we may be required or permitted by law to deny your request.

Notice to European users

The information provided in this “Notice to European Users” section applies only to individuals in Europe.

Personal information. References to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation.

Controller. Single Girl Club, LLC is the controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation.

Legal bases for processing. The legal bases of our processing of your personal information as described in this Privacy Policy will depend on the type of personal information and the specific context in which we process it. However, the legal bases we typically rely on are set out in the table below. We rely on our legitimate interests as our legal basis only where those interests are not overridden by the impact on you (unless we have your consent or our processing is otherwise required or permitted by law). If you have questions about the legal basis of how we process your personal information, contact us at hello@singlegirlclub.com.

Details regarding each processing purpose listed below are provided in the section above titled “How we use your personal information”.

Legal basis

- To operate the Service

Processing is necessary to perform the contract governing our provision of the Service or to take steps that you request prior to signing up for the Service. Where we cannot process your personal data as required to operate the Service on the grounds of contractual necessity, we process your personal information for this purpose

based on our legitimate interest in providing you with the Service you access and request.

- To send you marketing communications
- To display advertisements

Processing is based on your consent where that consent is required by applicable law. Where such consent is not required by applicable law, we process your personal information for these purposes based on our legitimate interests in promoting our business, and you showing you and tailored relevant content.

- For research and development
- For compliance, fraud prevention and safety
- To create anonymous data

These activities constitute our legitimate interests.

- To comply with law

Processing is necessary to comply with our legal obligations.

- To post user testimonials and feedback.
- Anything else we do with your consent

Processing is based on your consent. Where we rely on your consent you have the right to withdraw it any time in the manner indicated when you consent or in the Service.

Use for new purposes. We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal

information for an unrelated purpose, we will notify you and explain the applicable legal basis.

Sensitive personal information

We ask that you **not** provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Service, or otherwise to us. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Service.

Retention

We retain personal information where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested; to comply with applicable legal, tax or accounting requirements; to establish or defend legal claims; or for fraud prevention). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Your rights

European data protection laws give you certain rights regarding your personal information. If you are located within the European Union, you may ask us to take the following actions in relation to your personal information that we hold:

- Access. Provide you with information about our processing of your personal information and give you access to your personal information.
- Correct. Update or correct inaccuracies in your personal information.
- Delete. Delete your personal information.
- Transfer. Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- Restrict. Restrict the processing of your personal information.
- Object. Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by email to hello@singlegirlclub.com. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

Cross-Border Data Transfer

If we transfer your personal information from Europe to a country outside of Europe such that we are required to apply additional safeguards to your personal

information under European data protection laws, we will do so. Please contact us for further information about any such transfers or the specific safeguards applied.