

The Company's Services and systems, including registration, is housed on servers in the United States. If you are located outside of the United States, please be aware that information we collect (including cookies and device data) will be processed and stored in the United States, a jurisdiction in which the data protection and privacy laws and principles, including your data subject rights, may not offer the same level of protection as those in the country/region where you reside or are a citizen. By using our Services and providing information to us, you consent to the transfer to and processing of the information in the United States and, unless otherwise stated in this Privacy Policy, we use this consent as the legal ground for that data transfer.

Please read this Privacy Policy carefully, as your access to and use of the Services signifies that you have read, understand and agree to all terms within this Privacy Policy. If you do not agree with any part of this Privacy Policy or our Terms, please do not access or continue to use any of the Services or otherwise submit your Personal Data.

If you are a resident of the European Economic Area:

a. If you elect not to provide personal data

You may choose not to provide the Company with your Personal Data. However, if you choose not to provide your Personal Data, you may not be able to enjoy the full range of Services.

b. How to exercise your rights

The Company takes steps to keep your Personal Data accurate and up to date. If you reside in the European Economic Area, you have certain rights to the Personal Data that we have collected about you. To exercise your rights to your Personal Data, please contact us through our [Support Team](#) or at the address listed below. Subject to applicable law and in exceptional circumstances only, we may charge for this service and we will respond to reasonable requests as soon as practicable, and in any event, within the time limits prescribed by law.

You have the following rights:

- **Right of access to your Personal Data (Art. 15 GDPR):** You have the right to ask us for confirmation on whether we are processing your Personal Data, and access to the Personal Data and related information on that processing (e.g., the purposes of the processing, or the categories of Personal Data involved).

- **Right to correction (Art. 16 GDPR):** You have the right to have your Personal Data corrected, as permitted by law.
- **Right to erasure (Art. 17 GDPR):** You have the right to ask us to delete your Personal Data, as permitted by law. This right may be exercised among other things: (i) when your Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed; (ii) when you withdraw consent on which processing is based according to Art. 6 (1) (a) or Art. 9 (2) (a) GDPR and where there is no other legal ground for processing; (iii) when you object to processing pursuant to Art. 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or when you object to the processing pursuant to Art. 21 (2) GDPR; or, (iv) when your Personal Data has been unlawfully processed.
- **Right to restriction of processing (Art. 18 GDPR):** You have the right to request the limiting of our processing under limited circumstances, including: when the accuracy of your Personal Data is contested; when the processing is unlawful and you oppose the erasure of your Personal Data and request the restriction of the use of your Personal Data instead; or when you have objected to processing pursuant to Art. 21 (1) GDPR pending the verification whether the legitimate grounds of the Company override your grounds.
- **Right to data portability (Art. 20 GDPR):** You have the right to receive the Personal Data that you have provided to us, in a structured, commonly used and machine-readable format, and you have the right to transmit that information to another controller, including to have it transmitted directly, where technically feasible.
- **Right to object (Art. 21 GDPR):** You have the right to object to our processing of your Personal Data, as permitted by law. This right is limited to processing based on Art. 6 (1) (e) or (f) GDPR, and includes profiling based on those provisions, and processing for direct marketing purposes. After which, we will no longer process your Personal Data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

c. **How we may disclose your Personal Data**

The GDPR and national laws of European Union member states implementing the Regulation permit the sharing of Personal Data relating to users who are residents of the European Economic Area with third parties only under certain circumstances. If you reside in the European Economic Area, we will only share your Personal Data as described in our Privacy Policy under the heading "How We Disclose Personal Data" if we are permitted to do so under applicable European and national data protection laws and regulations.

d. **Company Privacy Shield Statements**

The Company has self-certified that it complies with the EU-U.S. Privacy Shield Framework ("Privacy Shield") and the Swiss-U.S.- Privacy Shield regarding the collection, use, and retention of Personal Data from European Union member states and Switzerland.

For EU and Swiss Personal Data received in the United States under the Privacy Shield, the Company has self-certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the standards of this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles govern. To learn more about the Privacy Shield program, please visit the [US Department of Commerce Privacy Shield website](#).

Under the Onward Transfer Principle, we may remain liable for the processing of European Personal Data that we transfer to our third party agents or service providers. In some instances, we may also be required to disclose Personal Data to comply with valid requests from public authorities, including for national security or law enforcement purposes.

In compliance with the Privacy Shield, the Company commits to resolve your complaints concerning data privacy and our collection or use of your Personal Data. We welcome you to bring any concerns directly to us through our [Support Team](#). Eligible unresolved privacy complaints related to violations of the Privacy Shield Principles can be reported to JAMS, an alternative dispute resolution provider located in the United States and Canada. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by the Company, please visit <https://www.jamsadr.com/eu-us-privacy-shield> for information on how to file a complaint with JAMS.

Note that if your complaint is not resolved through either a direct interaction with the Company, or JAMS, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

For the purposes of enforcing compliance with the Privacy Shield, the Company is subject to the investigatory and enforcement powers of the United States Federal Trade Commission.

e. **Marketing communications**

Where we are legally required to do so, we ask you for your prior consent before providing you with promotional materials or information. When required by local law, when marketing consent is obtained, we use the double-opt-in method (confirmation of your email address by email before sending you promotional messages) in order to verify your consent. You may revoke your consent at any time (this will not affect the processing of your Personal Data undertaken until the revocation). If you want to stop receiving promotional materials, etc., you can do so at any time as outlined in the [Change Consent Settings for Communication Preferences](#) section.

f. **Additional use of Personal Data**

Additional use of your Personal Data that is not described in this Privacy Policy will only take place as required by statute or when we have obtained your consent.

g. **Legal Basis for Processing under the GDPR**

In this section we provide information on the legal basis for our processing of your Personal Data as required by Art. 13 and 14 of the GDPR:

- When you register for an account or interact with our Services, such processing is necessary for the performance of our Services, Art. 6 (1) (b) GDPR.
- When we collect precise Location Data following your prior consent, we process such data on the basis of your prior consent, Art. 6(1)(a) GDPR. In other cases where we process your Location Data without consent, for example in order to provide our Services, such processing is necessary for the performance of our Services, Art. 6 (1) (b) GDPR.
- When you communicate with us or sign up for promotional materials, we process such data on the basis of our legitimate interest, Art. 6 (1) (f) GDPR, and our legitimate interest is to provide you with our promotional messages. Where we are required under applicable local law to obtain your consent for sending you marketing information, the legal basis is your consent, Art. 6(1)(a) GDPR.
- When you participate in special activities, offers, or programs.
 - For non-sensitive Personal Data, we process such data on the basis of our legitimate interest, Art. 6 (1) (f) GDPR, and our legitimate interest is to

provide you with our promotional messages or to allow you to participate in our special activities, offers or programs.

- When you engage with our online communities or advertising and we actively collect your Personal Data in this context, we process such data on the basis of our legitimate interest, Art. 6 (1) (f) GDPR, and our legitimate interest is to provide you with our promotional messages.
- When you access third party products and services and we obtain Personal Data about you from such third party sources:
 - For Personal Data that we need in order to perform the Services (e.g. if you pay for third party products through our Services), (e.g. if you pay for third party products through our Services), such processing is necessary for the performance of our Services, Art. 6 (1) (b) GDPR.
 - With regard to other Personal Data, we process such data on the basis of our legitimate interest, Art. 6 (1) (f) GDPR, and our legitimate interest is to enhance your experience and to improve our Services.
- When you connect with us through social media:
 - Where we collect your consent in such case, for instance for marketing purposes, we process such data on the basis of your prior consent, Art. 6 (1) (a) GDPR.
 - Where we do not collect your consent in such case, we process such data on the basis of our legitimate interest, Art. 6 (1) (f) GDPR, and our legitimate interest is providing you with better Services and to enable you to use the full range of our Services (Art. 6 (1) (f) GDPR).
- When we collect data from third parties or publicly-available sources:
 - For Personal Data which we need in order to perform the Services (e.g. for email verification purposes), such processing is necessary for the performance of our Services, Art. 6 (1) (b) GDPR.
 - With regard to other Personal Data, we process such data on the basis of our legitimate interest, Art. 6 (1) (f) GDPR, and our legitimate interest is providing you with better Services and to enable you to use our Services more efficiently.
- When we leverage and/or collect cookies, device IDs, Location Data, data from the environment, and other tracking technologies, we process such data on the basis of your consent, Art. 6 (1) (a) GDPR, and based on our legitimate interest, Art. 6 (1) (f) GDPR, where we do not obtain your consent and our legitimate interest is to provide you with better Services or marketing.
- When we track you in our venues, we process such data on the basis of our legitimate interest, Art. 6 (1) (f) GDPR, and our legitimate interest in enhancing your shopping experience as well as loss or crime prevention.

- When we use coarse location and data from sensors, we process such data for strictly necessary purposes in order to perform our Services, Art. 6 (1) (b) GDPR; and for our legitimate interest in marketing and improving our Services, Art. 6 (1) (f) GDPR).
- When we aggregate or centralize data, such processing is either necessary for the performance of our Services, Art. 6 (1) (b) GDPR, or we process such data on the basis of our legitimate interest, Art. 6 (1) (f) GDPR, and our legitimate interest is to provide you with better or customized Services and marketing.
- When you sign up for our services that consist of social sharing and communication with others (including linking you to friends across platforms:
 - Where we collect your consent in such case, we process such data on the basis of your prior consent, Art. 6 (1) (a) GDPR.
 - Where we do not collect your consent in such case, such processing is necessary for the performance of our Services, Art. 6 (1) (b) GDPR.
- When we provide you geographically relevant Services, offers, or advertising:
 - Where we collect your consent in such case, we process such data on the basis of your prior consent, Art. 6 (1) (a) GDPR.
 - Where we do not collect your consent in such case, for such data that we need in order to perform the Services, such processing is necessary for the performance of our Services, Art. 6 (1) (b) GDPR.
 - Where we do not collect your consent in such case and where we do not need such data in order to perform the Services, we process such data for our legitimate interest in offering you marketing and improving our Services, Art. 6 (1) (f) GDPR).
- When we disclose Personal Data to our affiliates and partners, and to our service providers and vendors:
 - Where we collect your consent in such case, we process such data on the basis of your prior consent, Art. 6 (1) (a) GDPR
 - Where we do not collect your consent in such case, such processing is necessary for the performance of our Services, Art. 6 (1) (b) GDPR, or we process such data on the basis of our legitimate interest, Art. 6 (1) (f) GDPR, and our legitimate interest is to provide you with better Services and marketing.
- When we process or share Personal Data in the event of an actual or contemplated sale, we process such data for our legitimate interest in offering, maintaining, providing, and improving our Services, Art. 6 (1) (f) GDPR).

- When we conduct analytics, we process such data on the basis of our legitimate interest, Art. 6 (1) (f) GDPR, and our legitimate interest is to enhance your experience and to develop and improve our Services.
- When we investigate suspected illegal or wrongful activity, we process such data on the basis of our legitimate interest, Art. 6 (1) (f) GDPR, and our legitimate interest is to ensure compliance with legal requirements and law enforcement requests and for public safety purposes.

h. Right to lodge a complaint before the Data Protection Authority

We encourage you to contact us directly and allow us to work with you to address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority, in particular in the EU Member State where you reside, work or the place of the alleged infringement. You have the right to do so if you consider that the processing of Personal Data relating to you infringes applicable data protection laws.

i. Changes to this Privacy Policy

In order to enhance our Services it might be necessary to change this Privacy Policy from time to time. We therefore reserve the right to modify this Privacy Policy in accordance with the applicable data protection laws. Please visit our Website from time to time for information on updates to this Privacy Policy.

j. How to contact us or our Privacy Office

In case of questions about the processing of your Personal Data please contact us at [Support Team](#).

If we are required under applicable law to appoint a data protection officer (DPO), you can contact the DPO that is responsible for your country/region at [Support Team](#).

Makeready LLC is the data controller for makereadyexperience.