

EFFECTIVE DATE: JULY 28, 2016; UPDATED DECEMBER 30, 2019 WITH UPDATED CONTACT INFORMATION; UPDATED MARCH 20, 2020

Bewearcy solution, Inc. (Bewearcy solution", "us", "we" or "our") is committed to respecting and protecting the privacy of our Users. We understand and acknowledge that our Users have a legitimate expectation of privacy, including an expectation that we will protect their identities and personal information from disclosure to third parties, and we are committed to upholding that expectation of privacy with very limited exceptions, as described below. "When the term "Users" is used in this Privacy Policy and related documents, it shall mean: (i) visitors and users of our website and our apps as defined below; and (ii) consignors to Bewearcy ("Consignors") who are also subject to additional consignment terms pursuant to our Consignment Agreement ("Users", "you" or "your").

As used herein, the "Site" shall mean our website ([www.bewearcy.com](http://www.bewearcy.com)) and our apps ( Bewearcy iOS and Android apps). In the Site, we provide Users with access to sales of consigned luxury items and other related services (the "Service" or " Bewearcy Service").

This Privacy Policy covers personal information collected about our Users and is part of our overall Terms of Service ("TOS"). Included in this Privacy Policy is: (i) our Cookie Policy; (ii) an additional supplementary policy specifically for citizens of the European Union ("EU Privacy Policy"); and (iii) an additional supplementary policy specifically for residents of California ("CCPA Privacy Policy").

This Privacy Policy describes:

1. the information identifying you that we collect;
2. how we use this information;
3. the legal basis upon which we process it;
4. with whom it is shared; and
5. how it is stored.

This Privacy Policy also describes other important topics relating to your personal information and privacy.

Please review this Privacy Policy to better understand our practices as they apply to your personal information. By using Bewearcy Service or accessing the Site, you confirm that you

have read and understood the entirety of this Privacy Policy and agree to be bound by it and the other documents referenced herein.

Our Terms of Service (including Consignment Terms if you are a Consignor) apply to Bewearcy Service and this Site. If you do not agree to them, then you should not continue to use Bewearcy Service or the Site.

# CHANGES TO OUR PRIVACY POLICY

From time to time, we may modify this Privacy Policy in our sole discretion. If we make any updates or changes to this Privacy Policy, all modifications will be posted to this Site, and will be effective immediately upon our posting and, where appropriate, notified to you by post or email. By continuing to use Bewearcy Service, or using the Site, after updates are posted and effective you are confirming that you have read and understood the latest version of the Privacy Policy.

## WHAT PERSONAL INFORMATION DO WE COLLECT?

**Identifiers.** We collect personal information of all Users of Bewearcy website and our apps, which includes identifiers such as:

1. your name;
2. phone number;
3. postal address;
4. email address.
5. Internet Protocol (IP) address;

**Internet or other electronic network activity information including:**

1. browser type;
2. your Internet Service Provider (ISP);

3. website referring/exit pages;
  4. platform type;
  5. date/time stamp;
  6. other information related to your use of the Site.
7. We may receive some personal information about you from third parties such as public websites and social media platforms.

### **Commercial information**

1. We require you to register for the Site in order to use Bewearcy Service or to act as a Consignor to Bewearcy.
2. information about your use of Bewearcy Service (including account related information such as payment information, purchase history, consign history);
3. customer services information; and
4. customer relationship management and marketing information.

### **Information Received Directly from You**

1. Opinion polls, surveys, contests, or sweepstakes. If you participate in our opinion polls, surveys, contests, or sweepstakes, we may collect additional personal information about you in connection with your response or entry.
2. Consignment. Additionally, you may choose to make other personal information available to us in connection with the consignment of an item, when you submit a video or blog for publication on the Site, email us, or invite a friend to join the Site. See the Invitations section below for more information

Please note that we need certain types of personal information so that we can provide Bewearcy Service to you or so that you can be a Consignor. If you do not provide us with such personal information, or ask us to delete it, you may no longer be able to access our services or provide goods and services to us.

# USE OF PERSONAL INFORMATION WE COLLECT

We, or third party service providers acting on our behalf, collect, use, and store the personal information we collect to:

1. allow you to access and use our Site;
2. communicate with you (see Communicating With You section below);
3. register users;
4. process requests and orders (including membership registration);
5. provide technical support;
6. store information about your preferences;
7. recognize you when you return to our Site;
8. enable you to participate in our opinion polls, surveys, contests, or sweepstakes;
9. administer our Site;
10. ensure the security of our services and our Site;
11. comply with any procedures, laws, and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so (subject to our making all reasonable efforts, consistent with applicable laws and regulations, to protect our Users' identities and personal information from disclosure to third parties); and
12. establish, exercise, or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

## COMMUNICATING WITH YOU

We will contact you (including by email or mail) with information about our products, services, and offers which either you request, or which we believe you may be interested in (including through newsletters, alerts, and reminders about recurring event sales if it is in our legitimate interests, for business development and marketing purposes, unless you have told us that you don't want to receive these messages by sending us an email at [support@bewearcy.com](mailto:support@bewearcy.com)

From time to time we will send you service-related emails, such as a welcome email when you register for the Site.

If you provide us personal information when you communicate with us (including in person, by phone, or via email) this information may be shared with a Consignor or Customer Relations representative, employee, or expert that is most likely to be able to address your inquiry. This information will be used only for the purpose of responding to your inquiry.

## **INVITATIONS**

When you invite a friend to join our Site, we will automatically send your friend an email invitation on your behalf. We will not use your friend's email address for any other purpose unless they join our Site or request further information or response from us. Similarly, when you email a message using the Invite a Friend function, we do not store the email addresses that are used to facilitate the email communication.

## **OPINION POLLS AND SURVEYS**

We may share personal information we collect from your responses to opinion polls or surveys with third parties. If we do so, we will provide you with notice and the opportunity to consent.

## **CONTESTS AND SWEEPSTAKES**

If you enter a contest or sweepstakes conducted by Bewearcy and/or one of our partners, we may contact you in connection with that particular contest or sweepstakes, including in order to update you regarding your status, administer the promotion, or let you know that a promotion has ended.

## **ONLINE TRACKING**

Like most websites, we, our service providers, and our third-party partners may collect certain information about your interaction with our Site. This information may be stored in log files. Information stored in log files may include IP addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and other information.

We collect this information through the use of cookies and other similar technologies. We use this information to analyze demographic and other trends, administer the site, track aggregate usage of the Site, and provide you with relevant advertising.

Where we use cookies on our Site, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you will not be able to access all or parts of our Site or to use all the functionality provided through our Site.

For detailed information on the cookies we use and the purposes for which we use them, please refer to our [cookies policy](#). By continuing to use our Site and/or our services, you are agreeing to our use of cookies as described in our cookies policy.

Your Privacy Choices, the legal basis on which we use your personal information and right to control our use of your personal information, are described below.

# SHARING OF PERSONAL INFORMATION

## THIRD PARTIES

We may need to share your personal information with our contractors in the course of operating our business and providing products or services to you. These contractors include vendors and suppliers, including but not limited to payment processors, suppliers of technical and support services, logistics providers, and cloud service providers that provide us with technology, services, and/or content for the operation and maintenance of our Site or Service. We will also share your personal information with companies that assist us in our marketing, advertising and promotional activities, analytics, and search engine providers that assist us in the improvement and optimization of our Site.

Access to your personal information by these contractors is limited to the information reasonably necessary for the contractor to perform its limited function. We require our contractors to keep

the personal information they are provided with confidential and to comply with the terms of this Privacy Policy and applicable laws.

We will not rent, sell, or share your personal information with third parties or third-party advertisers for their own marketing purposes without your consent except to provide you with a product or service you request or as described in this Privacy Policy. If you have given your consent for us to use your personal information, but later change your mind, you should contact us using the information in the HOW TO CONTACT US section below and we will stop doing so.

We may also disclose and use anonymized, aggregated reporting and statistics about users of our website and apps or our goods and services and from interactions with us and our brands on social media for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes. None of these anonymized, aggregated reports or statistics will enable our users to be personally identified.

## **DISCLOSURES REQUIRED BY LAW OR FOR BUSINESS PURPOSES**

We may disclose personal information pursuant to a request from law enforcement, or as otherwise required by law, or, in our sole discretion, to protect our rights, property or interests, including to enforce this Privacy Policy or our Terms of Service. We will make all reasonable efforts, consistent with applicable laws and regulations, to protect our Users' identities and personal information from disclosure to third parties. In the event that we are legally compelled to disclose your personal information to a third party, we will make reasonable efforts to notify you unless doing so would violate the law or court order.

In our sole discretion, we may also disclose information we collect to a third party when we believe it is reasonably necessary to investigate or prevent harm, fraud, abuse, or illegal conduct, including to enforce or apply our terms and conditions or any other agreement or to respond to any claims, or to protect our rights or the rights of a third party. We will also disclose your personal information to third parties where it is in our legitimate interests to do so to run, grow and develop our business. Information collected from this Site may also be transferred as part of a merger or other combination, or as part of a restructuring, bankruptcy, transfer of assets, or to our successors in interest.

## **RETENTION OF PERSONAL INFORMATION**

We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time we retain personal information for depends

on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

In order to enforce the terms of this Privacy Policy, resolve disputes, or provide information to satisfy applicable governmental laws, regulations, investigations or proceedings, we may need to retain your personal information in our files. We will do so in compliance with applicable law.

# YOUR PRIVACY CHOICES

## UPDATES TO YOUR INFORMATION

You can contact us at any time to update, change or delete personal information Bewearcy maintains about you.

## CHOICE/OPT-OUT

Users who no longer wish to receive our newsletters, alerts, or promotional communications may opt-out of receiving these communications at any time.

## HOW TO EXERCISE YOUR CHOICES

You may notify us of your choices or preferences by accessing your "Account Info" on the Site, or by contacting us as set forth in the "How to Contact Us" section below.

# ADDITIONAL INFORMATION

## THIRD PARTY WEBSITES

This Site contains links to other websites provided by third parties. Please be aware that we do not control these third-party websites or any of the content contained on those websites. Once you have left our Site, we cannot be responsible for the privacy practices of such other websites. We encourage you to exercise caution and to read the privacy policy for the website you visit. The inclusion of hyperlinks to third party websites on our site in no way constitutes an endorsement by us of such websites' content, actions, or policies.

## AGGREGATED INFORMATION

We may share aggregated information about you with third parties. Aggregated information is non-personal information about you that is combined with the non-personal information of other users.

## **ACCESS BY CHILDREN OR MINORS**

Our Site is not directed to children under the age of 13, and our Terms of Service prohibit minors from using our Site or Service. We do not knowingly collect any information from children under 13.

## **SECURITY**

We take precautions to protect information that we collect from our Users. We protect the information entrusted to us by taking all reasonable precautions to safeguard the confidentiality of personal information, including through use of appropriate physical, technical, and administrative safeguards and measures. These protections include restricting access to personal information to employees who need the information to perform a specific job. Bewearcy provides its employees training on its security and privacy practices. Technical safeguards and measures include use of encryption, passwords for access to our systems and use of anti-virus software.

However, in the course of provision of your personal data to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, no information security safeguards can be guaranteed to be completely secure, so you should use caution whenever providing personal information online, electronically or otherwise. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorized access to it.

Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

# **HOW TO CONTACT US**

If you have any questions or comments about this Privacy Notice, or if you would like us to update information we have about you or your preferences, please contact us by email at [support@bewearcy.com](mailto:support@bewearcy.com)

You also may write to us at:

Bewearcy

Attn: Privacy Team

Legal Department

8 The Green street

Dover, DE 19901

For citizens of the European Union:

As we are not an establishment located in the European Union, we have appointed an EU based representative who can be contacted at the following address: [support@bewearcy.com](mailto:support@bewearcy.com);

You may also make a complaint to the data protection authority in the European Union country where you are based. If you are unsure which data protection authority to contact, please contact us. Alternatively you may seek a remedy through local courts if you believe your rights have been breached.

## COOKIE POLICY

EFFECTIVE DATE: JUNE 20, 2021

Our website uses cookies. This policy explains what cookies are, why we use them, and how you can manage their use.

## WHAT ARE COOKIES?

Cookies are small text files which are sent to your browser when you visit our website. When you visit our website again, the cookie allows our website to recognize your browser. When you visit

our website, cookies may also be sent to your browser by other websites that are used for advertisements on other sites you may visit.

Cookies are useful because they help us make your website experience more enjoyable. They allow us to recognize your device (e.g. your laptop or mobile device) so that we can tailor your experience of our website. You can find out more about cookies at:  
<https://www.epic.org/privacy/internet/cookies/>.

## WHY DO WE USE COOKIES?

Cookies do many different jobs on this website, such as letting you navigate between pages efficiently, remembering your preferences, remembering your username and password, enabling you to keep goods in your shopping basket, letting us analyze how well our website is performing, and improving your experience. They also help ensure that advertisements you see while you are on other websites are more relevant to you and your interests.

## WHAT TYPES OF COOKIES DO WE USE?

We want you to understand the different types of cookies that we use on our website. Some of these cookies are essential to the operation of our website. Others are not essential but help to improve our website by collecting user information or try and improve your experience of our website by remembering your choices.

Generally, our cookies perform up to four different functions:

### **TYPE 1 – STRICTLY NECESSARY COOKIES – WHICH ENABLE SERVICES YOU HAVE SPECIFICALLY ASKED FOR**

We use several cookies which are essential to the operation of this website. For example, these types of cookies let us identify subscribers and ensure they can access the subscription-only areas of this website, enable our website to remember the goods that you add to your shopping cart, provide the necessary security your visit to our website requires, and help ensure the content of the pages you request load quickly. Without these cookies, services that you have asked for cannot be provided.

## **TYPE 2 – PERFORMANCE COOKIES – WHICH COLLECT ANONYMOUS INFORMATION ABOUT THE WEB PAGES YOU VISIT**

These cookies collect information about how visitors use our website, for example, which pages our visitors go to most often, and if they get error messages on those pages. These performance cookies don't collect information that identifies you as an individual – all information they collect is aggregated and anonymous. The information gathered is only used to improve how our website works.

We use Google Analytics on our website to help us analyze how our website is used. You can find out more about this popular website analytics tool here:

<http://www.google.com/analytics/index.html>. Google Analytics uses performance cookies to track visitor interactions. For example, by using cookies Google can tell us which pages our users view, which are most popular, what time of day our website is visited, whether visitors have been to our website before, what website referred the visitor to our website, and other similar information. All this information is anonymized. Google takes the privacy and security of your Google Analytics data seriously and you can find out more about how it protects your data here: <http://www.google.com/analytics/learn/privacy.html>.

## **TYPE 3 – FUNCTIONALITY COOKIES – WHICH REMEMBER YOUR CHOICES TO IMPROVE YOUR EXPERIENCE.**

These cookies allow our website to remember choices you make, such as, remembering your username, the region you are in, and changes you make to various other parts of our website which you can customize, such as your MySales page. The aim of these cookies is to provide you with a more personal experience so that you don't have to reset your preferences each time you visit us.

## **TYPE 4 – TARGETING OR ADVERTISING COOKIES WHICH REMEMBER YOUR BROWSING HABITS TO TRY AND DISPLAY RELEVANT ADVERTISING WHEN YOU VISIT OTHER ONLINE SITES.**

These cookies track your browsing habits so that we can show you advertising which we hope is relevant to your interests. We believe it is useful to show you advertisements that are tailored to your interests. These advertising cookies use information about your web browsing activity to group you with other users who have similar interests and show you advertisements based upon

those interests. For example, these cookies may remember that on our website you viewed pages relating to particular products. Based on that information, with our permission, third party advertisers can place cookies on your browser to enable them to show you those products while you visit other sites.

These types of cookies are also used to limit the number of times you see an advertisement as well as to help measure the effectiveness of advertising campaigns.

## WE MAY TRACK WHETHER YOU OPEN EMAILS THAT WE SEND

Our emails may contain a web beacon to track who opens an email, when, and whether that user clicks on any of the links in the email. We may use this information to help us analyse which of our users are interested in particular topics. When you delete the email, the web beacon will be deleted.

## HOW TO MANAGE COOKIES ON OUR WEBSITE

Cookies do lots of important jobs on our website and help to make your online experience more personal and more enjoyable.

By using our website, you are deemed to consent to the use of cookies as described in this cookie policy.

However, you can disable all our cookies if you choose. If you do so, you may find that significant parts of our website do not work at all, or do not work correctly.

## DISABLING COOKIES

If you would like to disable targeting, advertising or cookies, which remember your browsing habits and try and display relevant advertising when you are online, you can visit <http://www.youronlinechoices.com/uk/your-ad-choices>. If you choose to turn off these cookies you will still see advertising on the internet, but it may not be tailored to your interests. It does not mean that you won't be served any advertisements while you are online. While many companies

involved in using targeting, advertising or cookies and serving online behavioral advertising appear at the above link, not all do. Therefore, even if you choose to turn off cookies used by all the companies listed, you may still receive some targeting, advertising or cookies and some tailored advertisements from other companies.

You can also manage this type of cookie in the privacy settings on the web browser you are using. Please see below for more information.

## DISABLING OTHER COOKIES

You can disable and/or delete all types of cookies by using your browser settings. Cookies are generally easy to disable and/or delete but how you do so varies from browser to browser. The "help" function within your browser should tell you how to do it. The best way may be to close your browser and then search for "cookie folder" or "cookie manager" or simply "cookie".

## FURTHER INFORMATION

If you have any questions relating to this Cookie Policy, please contact us using the information in the HOW TO CONTACT US section above.

## CUSTOMER DATA INFORMATION

EFFECTIVE DATE: JUNE 21, 2021

### Q: HOW DO I CLEAR MY SEARCH HISTORY?

A: All web browsers remember a list of the web pages you've visited. You can delete this list at any time, clearing your browsing history and erasing the tracks stored on your computer, smartphone, or tablet. Each browser has its own separate history, so you will need to clear the history in multiple places if you have used more than one browser. See below for further details on how to delete your browsing history for the most popular browsers.

#### **For Microsoft Internet Explorer:**

1. Choose "Tools" then "Internet Options"
2. Click on the "Privacy" tab

3. Select the appropriate setting

**For Google Chrome:**

1. Choose Settings then Advanced
2. Under "Privacy and Security" click "Content Settings"
3. Click "Browsing History"

**For Safari:**

1. Choose Preferences then Privacy
2. Click on "Remove all Website Data"

**For Mozilla Firefox:**

1. Choose "History" then "Clear Recent History..."
2. Click the appropriate options
3. Click "Clear Now"

**For Opera 6.0 and further:**

1. Choose "Files" then "Preferences"
2. Privacy

## Q: HOW DO I DELETE COOKIES?

A: The effect of disabling cookies depends on which cookies you disable but, in general, our website may not operate properly if cookies are switched off. You will not be prevented from making purchases on the site if you only disable third party cookies. If you disable all cookies, you will be unable to complete a purchase on our site.

If you want to disable cookies on our site, you need to change your website browser settings to reject cookies. How you can do this will depend on the browser you use. See below for further details on how to disable cookies for the most popular browsers.\*

**For Microsoft Internet Explorer:**

1. Choose "Tools" then "Internet Options"
2. Click on the "Privacy" tab
3. Select the appropriate setting

**For Google Chrome:**

1. Choose "Settings" then "Advanced"
2. Under "Privacy and Security," click "Content Settings"
3. Click "Cookies"

**For Safari:**

1. Choose "Preferences" then "Privacy"
2. Click on "Remove all Website Data"

**For Mozilla Firefox:**

1. Choose "History" then "Clear Recent History..."
2. Click the appropriate options
3. Click "Clear Now"

**For Opera 6.0 and further:**

1. Choose "Files" then "Preferences"
2. Privacy

Where you have not set your permissions, we may also separately prompt you regarding our use of cookies on the site.

Except for essential cookies, all cookies used on our site will expire after twelve (12) months.

\*Please note the makers of the browsers listed above may change the standard settings on their products from time to time or modify the procedures from what is displayed above without prior notice.

# EU PRIVACY POLICY

EFFECTIVE DATE: AUGUST 29, 2019

This European Union Privacy Policy (“EU Privacy Policy”) is a supplement to the Privacy Policy and Cookie Policy of Bewearcy solution, Inc. (“Bewearcy”, “us”, “we” or “our”) and applies solely to Users who are citizens of the European Union. When the term “Users” is used in this EU Privacy Policy, it shall apply only to those who are citizens of the European Union and are: (i) consumer(s), visitors and users of our website and our apps; and (ii) consignors to Bewearcy (“Consignors”) who are also subject to additional consignment terms pursuant to our Consignment Agreement (“Users”, “you” or “your”).

Defined terms as used herein shall have the same meaning as defined terms in the General Data Protection Regulation (GDPR).

## **LEGAL BASIS FOR USE OF YOUR PERSONAL INFORMATION**

In order to comply with European data privacy laws we are required and have considered the legal basis for using your personal information as set out in this EU Privacy Policy, which are as follows:

1. our use of your personal information is necessary to perform our obligations under any contract with you (for example, to comply with the terms of use of our Site which you accept by browsing our Site and/or to comply with our contract to provide Bewearcy Services); or
2. our use of your personal information as is necessary to complying with our legal obligations;
3. where none of the above apply, use of your personal information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our Site).

Our legitimate interests are to:

1. run, grow and develop our business;

2. operate our Site;
3. carry out marketing, market research and business development;
4. provide goods and services to our customers and consignors, make and receive payment, provide customer services and to know the identity of the customer that we are providing services to; and
5. place, track and ensure fulfilment of orders with our vendors.

### **RIGHTS IF YOU ARE A CITIZEN OF THE EUROPEAN UNION**

If you are a citizen of the European Union, then you have certain rights in relation to your personal information which are set out below. If you would like further information in relation to these or would like to exercise any of them, please contact us by using the contact information in the HOW TO CONTACT US section at any time. You have the right to request that we:

1. provide access to any personal information we hold about you;
2. update any of your personal information which is out of date or incorrect;
3. delete any personal information which we are holding about you;
4. restrict the way that we process your personal information;
5. stop processing your personal information for direct-marketing purposes;
6. provide your personal information to a third party provider of services;
7. provide you with a copy of any personal information which we hold about you; or
8. consider any valid objections which you have to our use of your personal information.

We will consider all such requests and provide our response within a reasonable period (and in any event any time period required by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances. If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

# CCPA PRIVACY POLICY

EFFECTIVE DATE: JUNE 20, 2021

This California Consumer Privacy Act Privacy Policy (“CCPA Privacy Policy”) is a supplement to the Privacy Policy and Cookie Policy of Bewearcy solution, Inc. (“Bewearcy”, “us”, “we” or “our”) and applies solely to Users who are residents of the State of California (as defined in Section 17014 of Title 18 of the California Code of Regulations). When the term “Users” is used in this CCPA Privacy Policy, it shall apply only to those who are residents of the State of California and are: (i) consumer(s), visitors and users of our website and our apps; and (ii) consignors to Bewearcy (“Consignors”) who are also subject to additional consignment terms pursuant to our Consignment Agreement (“Users”, “you” or “your”).

Defined terms as used herein shall have the same meaning as defined terms in the CCPA.

## WHAT PERSONAL INFORMATION DO WE COLLECT?

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). The CCPA sets forth certain categories of information under Cal. Civil Code §1798.140 (o)(1) and we have listed all of those categories below. For each category, we have provided information as to whether or not we have collected personal information under those categories within the last twelve (12) months:

### **A. Identifiers**

We collect personal information of Users of Bewearcy website and our apps, which fall within the category of Identifiers and which include personal information such as: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number or other similar identifiers.

### **B. Personal information categories listed in Cal. Civ. Code § 1798.80(e) (the California Customer Records Statute)**

We collect personal information of Users which may include personal information such as: A name, signature, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education,

employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Please note that some personal information included in this category may overlap with other categories listed herein.

**C. Characteristics of protected classifications under California or federal law**

We collect personal information such as Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information) if voluntarily provided by a job applicant as a result of a job application process or voluntarily submitted as part of employment or Human Resources process.

**D. Commercial Information**

This includes information such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. Included in this category is:

1. Information we receive from you when you register for the Site in order to use Bewearcy Service or to act as a Consignor to Bewearcy.
2. Information about Bewearcy Service including:
  - information about your use of Bewearcy Service (including account related information such as payment information, purchase history, consign history);
  - customer services information; and
  - customer relationship management and marketing information.

**E. Biometric Information**

We do not collect biometric information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

**F. Internet or other electronic network activity information including:**

1. browser type;

2. your Internet Service Provider (ISP);
3. website referring/exit pages;
4. platform type;
5. date/time stamp;
6. other information related to your use of the Site.

**G. Geolocation data**

We do not collect geolocation data that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

**H. Audio, electronic, visual, thermal, olfactory, or similar information**

We do not collect sensory information such as audio, electronic, visual, thermal, olfactory or other similar personal information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

**I. Professional or employment related information**

We collect professional or employment related information with regard to job applications, employment records, professional association memberships and other job-related personal information.

**J. Non-public education information defined as information that is not publicly available personally identifiable information as defined under the Family Educational Rights and Privacy Act (FERPA).**

We collect non-public education information that is personally identifiable information such as educational records and student records in connection with job applications and employment. We do not collect non-public education information that is personally identifiable information directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

**K. Inferences drawn from other personal information**

We collect information that may be considered a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

The above personal information is collected from the following sources:

1. Information Received Directly from You
2. Internet activity by your use of the Site including online tracking through use of cookies
3. Public websites and social media platforms

## THE BUSINESS OR COMMERCIAL PURPOSES FOR THE PERSONAL INFORMATION WE COLLECT

We may disclose your personal information to a third party for business or commercial purposes. When we disclose personal information for a business purpose, we enter into a written contract that describes the purpose and requires the recipient to keep that personal information confidential and not use it for any purpose except for providing the services set forth in the contract.

Accordingly, we may use or disclose the following personal information business or commercial purposes:

1. allow you to access and use our Site;
2. communicate with you (see the Communicating With You section in our Privacy Policy);
3. register users;
4. process requests and orders (including membership registration);
5. provide technical support;
6. store information about your preferences;
7. recognize you when you return to our Site;

8. enable you to participate in our opinion polls, surveys, contests, or sweepstakes;
9. administer our Site;
10. ensure the security of our services and our Site;
11. comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so; and
12. establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

## CATEGORIES OF PERSONAL INFORMATION SHARED FOR BUSINESS OR COMMERCIAL PURPOSES

In the preceding twelve (12) months, we have disclosed the following categories of personal information for business or commercial purposes:

Category A: Identifiers

Category B: California Customer Records personal information categories

Category C: Protected Characteristics Classifications under California or federal law

Category D: Commercial Information

Category F: Internet or other electronic networking activity information

Category I: Professional or employment-related information

Category K: Inferences drawn from an of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, predispositions and behavior

We disclose your personal information for a business purpose to the following categories of third parties:

1. Service providers.
2. Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold any personal information.

## YOUR PRIVACY RIGHTS AND CHOICES

If you are consumer as defined in the California Consumer Privacy Act (CCPA), i.e., a resident of California as defined in Section 17014 of Title 18 of the California Code of Regulations, you have certain rights in relation to your personal information under the CCPA. Under the CCPA, you have the following rights:

• **Right to Request Information Collected.** If we collect personal information about you, you have the right to request that we disclose to you the following upon our receipt of a verifiable consumer request from you:

- The categories of personal information we have collected about you
- The categories of sources from which the personal information about you is collected
- The business or commercial purpose for collecting or selling personal information
- The categories of third parties with whom we share personal information and
- The specific pieces of personal information we have collected about you

• **Right to Request Information Collected and Shared for a Business Purpose.** If we collect personal information about you that is disclosed for a business purpose, you have the right to request that we disclose to you:

- The categories of personal information that we have collected about you
- The categories of personal information we disclosed about you for a business purpose

• **Right Not to Be Discriminated Against.** You have the right to not be discriminated against by a business because you exercised any of the consumer's rights under the CCPA, including, but not limited to, by:

- Denying goods or services to you
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties
- Providing a different level or quality of goods or services to you or
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

• **Right to Request Deletion.** You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions.

- Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.
- We may deny your deletion request if retaining the information is necessary for us or our service providers to:
  - Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
  - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
  - Debug products to identify and repair errors that impair existing intended functionality.

- Exercise our right to free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Otherwise use your personal information internally in a lawful manner that is compatible with the context in which you provided it.
- **Right to Request Access and Data Portability.** Upon receipt of a verifiable request from you to access your personal information we shall promptly take steps to disclose and deliver, free of charge to you, the personal information in accordance with Cal. Civil Code §1798.100 (d). The personal information may be delivered by mail or electronically, and if provided electronically, the information shall be in a portable and, to the extent technically feasible, in a readily useable format that allows you to transmit this information to another entity without hindrance. We may provide personal information to you, but we are not required to provide personal information to you more than twice in a 12-month period.

## CONTACT INFORMATION

If you are a California resident and if you wish to submit a request to exercise your consumer rights under the CCPA or if you have questions regarding this policy, you may contact us by email at [support@bewearcy.com](mailto:support@bewearcy.com).

## ADDITIONAL CALIFORNIA PRIVACY RIGHTS

California's "Shine The Light" law permits California residents to annually request and obtain information free of charge about what personal information is disclosed to third parties for direct

marketing purposes in the preceding calendar year. Bewearcy does not distribute your personal information to outside parties for their direct marketing without your consent, except as provided for in this Privacy Policy.