# eTryOn - Privacy Policy

This Privacy Policy is meant to provide you with the information regarding how we, eTryOn services, collect personal data relating to you, where we collect it from, how we process it, who we share it with, how we secure it, and how can you enforce your legal rights for cease of processing, amendment, deletion and ratification.

This privacy policy covers your use of our software, apps, services, and the website.

Note that you are under no legal obligation to provide us with any personal data, and that your consent is the sole basis for our use of it.

By setting up an eTryOn account, by downloading and using our applications, by clicking the "I accept" button (or its equivalent), you are accepting the practices described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not register for an account with eTryOn, download apps made available by etryOn, or otherwise access our Services.

eTryOn is a project funded from the European Union's Horizon 2020 research and innovation programme under grant agreement No 951908. The level of personal data protection is adequate to the level required by all relevant EU regulation.

### HOW DO WE COLLECT PERSONAL DATA?

We collect personal data in the following methods: First, we collect personal data when you register to our services, use our services, contact us via forms, interact with us via support channels. We do so by taking the personal data you filled out in our forms and contents of messages. We also collect information via your use of the services, and our interaction, meaning the correspondence between the parties.

Then, we collect personal information when we interact with you: when you contact us through our support systems, when you send us emails or when you contact us via phone, or when we meet in person.

We also collect the technical information about you when you browse our website and use the services.

# WHAT PERSONAL DATA DO WE COLLECT?

We collect mainly information that relates to your use of our services, which includes: (i) demographics, your first and last name, your email address, your and approximate location (via your IP address); (ii) information on your interactions with us; (iii) information relating to browser type, device type, screen resolution, IP address and technical information; (iv) information relating to how you use our services, including clickstream and features used.

For the application's end-users, we may collect information about the use of the apps.

We also collect the contents of all correspondence between ourselves and prospective and actual users.

We may also collect log files from your use of the apps if you send it to us as a part of a support ticket.

We also collect User feedback, community discussions, chats and other interactions on our Services.

If you access our Services on your mobile telephone or other mobile device, including tablets, we collect mobile device identifiers, including MAC Address, and IP Address. Certain aspects of our Services will create and assign to your device an identifier that is similar to an account number. We may collect the name you have associated with your device, device type, telephone number, country, geo-location and any other information you choose to provide or allow us to access.

The categories of information we collect can include:

- Account Information
- •Examples of Personal Information collected: name, email, address, phone number.
- •Purpose of collection: to provide products or services to you to fulfill our contract, manage your account, to provide you with invoices and/or order confirmations, communicate with you, screen our orders for potential risk or fraud, and when in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.
- Order Information
- •Examples of Personal Information collected: name, billing address, shipping address, payment information, email address, and phone number. Note we use third-party payment processors to process your payments. Because we use third-party payment processors, we do not retain any personally identifiable financial information such as credit card numbers. Rather, all such information is provided directly to the third-party processor. The payment processor's use of your Personal Information is governed by their privacy notice. Please review each processor's privacy notice to understand how they will manage or otherwise process your Personal Information, including your financial data.
- •Purpose of collection: to provide products or services to you to fulfill our contract, to process your payment information, arrange for shipping, and provide you with invoices and/or order confirmations, communicate with you, screen our orders for potential risk or fraud, and when in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.
- •Communications and Customer Support Information
- •Examples of Personal Information collected: name, billing address, shipping address, email address, phone number, or any other Personal Information you choose to provide us.
- •Purpose of collection: to provide customer support, to investigate and respond to your inquiries, and to communicate with you, to enhance the services we offer to our users and to manage and grow our organization. If you register for our newsletters or updates, we may communicate with you by email.
- •AR Features (Photos and Images)
- •Examples of Personal Information collected: individual photos which may include backgrounds or other objects by which your general location could be derived.
- •Purpose of collection: to provide products or services to you to fulfill our contract.
- Marketing emails
- •Examples of Personal Information collected: email and applicable interests and communication preferences.
- •Purpose of collection: send you regular updates about our products or services, manage our communications with you, and send you information about products and services we think may be of interest to you.

# PERSONAL INFORMATION COLLECTED FROM OTHER SOURCES AND THIRD PARTIES

Although we often collect the Personal Information described above directly from you, we also collect this information through service providers and other third parties that collect it on our behalf, as noted below. Please note that our systems may record Personal Information that you type into our websites and other online Service even if you do not choose to submit it.

•Account Creation / Single Sign-On. We may use single sign-on ("SSO") to allow a user to authenticate their account through their work email. We will have access to certain information from those third parties in accordance with the authorization procedures determined by those third parties.

- •Examples of Personal Information collected: username, password, name, email address, and profile picture.
- •Purpose of collection: We use this information to operate, maintain, and provide to you the features and functionality of the Service. We may also send you service-related emails or messages (e.g., account verification, purchase confirmation, customer support, changes, or updates to features of the Site, technical and security notices).
- •Social Media. When you interact with our Service through various social media, such as when you click on the social media icon on the Service, follow us on a social media site, or post a comment to one of our pages.
- •Examples of Personal Information collected: profile information, profile picture, gender, username, user ID associated with your social media account, age range, language, country, and any other information you permit the social network to share with third parties. The data we receive complies with your privacy settings with the social media network.
- •Purpose of collection: We use this information to operate, maintain, and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages about products and services that may be of interest to you.

### INFORMATION FROM OTHER SOURCES.

We may obtain information from other sources, including through third-party information providers, customers, public sources, or through transactions such as mergers and acquisitions. We may combine this information with other information we collect from or about you. In these cases, our Privacy Notice governs the handling of the combined Personal Information. We use this information to operate, maintain, and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages about products and services that may be of interest to you.

### PERSONAL INFORMATION AUTOMATICALLY COLLECTED

As is true of most digital platforms, we and our third-party providers and partners collect certain Personal Information automatically when you visit or interact with our websites and:

- •Log Data: Including your internet protocol (IP) address, operating system, browser type, browser ID, the URL you entered and the referring page/campaign, date/time of your visit, the time you spent on our Service and any errors that may occur during your visit to our Service.
- •Analytics Data: Including the electronic path you take to our Service, through our Service and when exiting our Service, as well as your usage and activity on our Service, such as the links, objects, products and benefits you view, click or otherwise interact with (also known as "Clickstream Data"). This data will allow us to better understand how you are using our Service and help improve your user experience
- •Location Data: Including your general geographic location based on the Log Data we collect or more precise location when permitted by law.
- •Application Data: Some of our services offer mobile or browser applications to allow you to take advantage of our service offerings on the go and/or when visiting third-party websites and other online services. Certain of these applications also allow us to access more precise Location Data about you and collect information about your use and interactions with third-party websites and online services (including the products or services you are interested in or purchase) to better serve you. We, and our third-party partners such as Snap (through the use of the SnapCamera Kit to power the features of the AR technology) and Apple (through the use of the TrueDepth camera to improve the quality of the lenses), may also collect metadata included in the photos and images that you upload, such as your device model, camera type, camera settings (e.g. ISO, shutter, focal length, lens, aperture), image information (e.g. format, file size, date and time, resolution) or location data (e.g. geotagging).

- •Our third-party partners such as Snap Inc. may also use information from Apple's TrueDepth camera to improve the quality of Lenses. Information from the TrueDepth camera is used in real time Snap Inc. doesn't store this information on their servers or share it with third parties. Link to the Snap Inc Privacy Policy
- •We don't collect and share any Face Data with our APP.

Please keep in mind that when you voluntarily disclose Personal Information which is publicly viewable, that information will be publicly available and can be collected and used by others. We cannot control who views information (and what they do with information) you voluntarily post publicly.

### HOW DO WE PROCESS PERSONAL DATA?

We use your personal data to provide you with the services. This is the purpose of collecting the personal data and the main reason for processing. We use your personal data as part of the management of the relationship between us in that capacity.

When you provide us with your contact information, either by filling out a form, submitting a request, or contacting our support, we will keep this information on our services and customer relations and employee and supplier management systems. We use this to better understand our customers' needs and to contact them occasionally, and to perform, monitor, and manage our relations, duties, and obligations.

We process your personal data also to create statistic, non-personally identifiable, data which is used to assist us in better understanding of the use of our services, website and applications. By using this data we can help you use our products and services in a better way.

**AR Providers:** As part of the Service, we use augmented reality (AR) to enhance your photos and images and integrate the eTryOn apps. As described in the Collection and Use of Personal Information section, we use business partners such as Snap and Apple. Any information shared with Snap, Apple, or any of our third party business partners is subject to their privacy policy.

**Service Providers:** We share Personal Information with third party contractors and service providers who perform services on our behalf, which are subject to reasonable confidentiality terms, and which may include processing payments, shipping partners, AR features and technology, providing web hosting services, technology support providers, email communications providers, analytics providers, data storage providers, and web and video hosting providers and developers.

**Business Partners:** We may disclose Personal Information to our business partners for transactional and marketing purposes, including to promote their products or services. We may also share your Personal Information with other third parties who may have products or services we think you may enjoy.

**Aggregated and Anonymized Information:** We may share your Personal Information with others in an aggregated or otherwise anonymized form that does not reasonably identify you directly as an individual.

#### WHO HAS ACCESS TO YOUR PERSONAL DATA?

We do our best to ensure that your personal data remains secure. We provide our employees with limited, monitored, access, only on a need-to-know basis.

We also use some contractors that are engaged by our company to provide us with services. Both our employees and contractors are under strict confidentiality agreements.

We also use a few, limited, third parties to process your information. These third parties are:

•Mallzee, which is one of our business partners, and receives statistics about the use of our apps, but no

personally identifiable information.

- •Google, which helps us with advertising and remarketing.
- •Google Analytics, which collects information about the usage in our software and website.
- •WordPress, which hosts our website.

We also comply with legal requests, meaning that if we get an authorized legal warrant to provide your personal data from a law enforcement authority, court or other authorized authority, we will act accordingly.

#### HOW DO WE SECURE PERSONAL DATA?

We secure personal data by storing it in industry-grade servers, when information may be encrypted to prevent abuse and misuse. We also make sure that our servers are checked, occasionally, for known vulnerabilities and bugs, and we update our operating systems periodically. We make sure that all access to our servers is logged, and in some cases use two-factor-authentication.

#### WHEN DO WE DELETE PERSONAL DATA?

We remove personal data when it is no longer required. As a general rule, we delete personal information from user and marketing contacts six months after consent to contact is withdrawn.

### HOW CAN WE CONTACT YOU?

We use your contact information to contact you from time to time with updates relating to our project and applications or new features or information relating to a security breach, if it happens. We also may send you push notifications or text messages to update you with information relating to your specific use of the applications.

You can opt out from all notifications or any notifications using our services.

### HOW CAN YOU REVIEW, AMEND, OR DELETE YOUR PERSONAL DATA?

We can provide you with a copy of your personal data if you contact us by sending an email to etryon.project@gmail.com; after you do so, we will verify that this request is genuine, and send your personal data. If you find any of the personal data to be inaccurate, please let us know and we will amend it.

You can also request, post-review, that we remove personal data. In such case, we will retain the minimum amount that we are required by law, but will remove all excess data.

#### HOW CAN YOU UNSUBSCRIBE FROM OUR EMAILS?

You can unsubscribe from our emails by clicking the Unsubscribe link in such an email and following the instructions. Alternatively, you can unsubscribe by sending an email with "Unsubscribe" as the subject line to etryon.project@gmail.com. Your email address will be removed from our list of email addresses used for marketing purposes within ten working days.

# CAN YOU REQUEST THAT WE CEASE PROCESSING?

Yes. You can contact us at etryon.project@gmail.com and request that we cease processing your personal data. However, in such a case we will not be able to provide you with any of the services.

# **CHILDREN**

We do not knowingly collect Personal Information from children under the age of 16. If you are a parent or guardian and believe your minor child has provided us with Personal Information without your consent, please contact us as at etryon.project@gmail.com and we will take steps to delete such Personal Information from our systems.

### **COOKIES**

Our website uses first party and third party cookies. A cookie is a small file placed on your browser's environment which allows us to identify you as a unique user. It does not contain any personal information, nor can it be used to by anyone but ourselves and our third-party service providers (who provide third-party cookies).

You may opt out from storing cookies on your device altogether, or specifically from our website in your browser's settings. However, this may impair your use of our services.

#### WEB BEACONS

We also use "web beacons" to help deliver cookies and gather usage and performance data. Our website may include web beacons, cookies, or similar technologies from third-party service providers. By providing us with information about how you interact with our Services, these tools help us analyze and learn how to make our Services better and customize our communications with you. The following analytics technologies are in use: Google Analytics.

### **CLEAR GIFS**

We may also use clear gifs in our HTML-based emails to let us know which emails have been opened by recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. For this reason, these types of clear gifs are tied to personally identifiable information.

eTryOn and our partners, such as marketing partners and analytics providers, may use tracking technologies such as cookies, beacons, tags and scripts. These technologies are used in analyzing trends, administering our websites, tracking users' movements around the apps, and to gather demographic information about our user base as a whole. We use cookies for various purposes including our shopping cart, to remember users' settings, and for authentication. Users can control the use of cookies by adjusting individual browser settings. However, if you reject cookies, you may still use our websites, but your ability to use some features or areas of our websites may be limited.

We may also use tools or third party analytical software to automatically collect and use certain non-Personal Information that does not directly enable eTryOn to identify you.

### CAN WE AMEND THIS PRIVACY POLICY?

Yes. We may amend this privacy policy from time to time. We will keep you updated when we do so. Please note that updates and changes will be logged in our changelog hereunder. No update shall have any retroactive effect.