Shoes For Crews Privacy Policy

Effective: April 6th, 2020

Thank you for visiting our website. Your privacy is very important to us. We collect no personal information about you when you visit our Web site unless you choose to make such information available to us by submitting such information. This privacy policy addresses how Shoes For Crews, LLC (“Shoes For Crews,” “we,” “us,” “our) collect and use information you provide. By visiting www.shoesforcrews.com (this “Site”), and providing your information to us, you agree to accept the practices described in this Privacy Policy.

What Information Is Collected
We group the collection of user information into two categories: personal, which is information identifiable to a specific member, and aggregate, which is general demographic information that does not identify any individual member. Personal information may include your name, email address, mailing address and phone number. We may also collect certain demographic information such as your Site preferences, sizes, gender, geographical location, language, time zone, (some of the information we ask for may be optional). Shoes For Crews may use or disclose aggregate information for any purpose.

How We Use Your Information
We collect personal information to make our services related to this Site (the “Services”) more rewarding for you to use, including billing, shipping and tracking your orders. If we have any questions or concerns regarding your order, we may use this information to contact you. We also use this information for internal purposes, such as studying our customers’ preferences and improving customer experience on the Site. We may also use your information to contact you for promotional purposes and provide customer service to you. We may combine information about you with information from other sources in order to improve the quality of our Services.
We also receive and store certain personally non-identifiable information, which is collected passively using various technologies, and cannot presently be used to specifically identify you. This Site may use such information and pool it with other information to track, for example, the total number of visitors to our Site, the number of visitors to each page of our Site, the domain names of our visitors' Internet service providers, and how our users use and interact with the Services. Also, in an ongoing effort to better understand and serve you, we often conduct research on customer demographics, interests and behavior based on the personal and other information provided to us. This research may be compiled and analyzed on an aggregate basis. We may share this non-identifiable and aggregate data with affiliates, agents and business partners, but this type of non-identifiable and aggregate information does not identify you personally. We may also disclose aggregated user statistics in order to describe our Services to current and prospective business partners, and to other third parties for other lawful purposes.

How Is This Information Shared
There are certain circumstances in which we may share your personal information with certain third parties without further notice to you, as set forth below:

- We do not sell any of your personal information to third parties for profit. Like most online businesses, we do share some information with contracted third parties in order to provide better services and advertising to you and do afford you the option to opt-out of sharing this information.
- As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, your information may be part of the transferred assets.
- When we believe in good faith that disclosure is necessary to protect the rights, property and safety of Shoes For Crews, its users or the public.
- As required by law, to comply with a judicial proceeding or court order, to exercise our rights, or to defend against any claims.
If you choose to share personal information with us via email, mail, phone, fax or filling out an electronic form on our website, we may use the information we collect from and about you for any of the following purposes: (1) to fulfill your requests for products and services; (2) to provide you with targeted offers and advertising; (3) to contact you with information and promotional materials and offers from our company as well as from our subsidiaries, affiliates, marketing partners, advertisers and other third parties; (4) to contact you; (5) to review site usage and operations; (6) to address problems with the site, our business or our products and services; and (7) to protect the security or integrity of the site and our business.

We, or third-party service providers acting on our behalf, may use cookies or web beacons on our site. A cookie is a small text file that may be stored in the memory of your computer when you access the site. A web beacon is an electronic image used to recognize a cookie on your computer when you view a web page. We may use cookies and web beacons to collect non-personal information from you, including your IP address, browser type, the time and length of your visit, the pages of the site you visit and other clickstream data. This information may be used in order to: (1) remember the products in your shopping cart; (2) recognize you when you return to the site; (3) improve and personalize your experience on our site; (4) provide you with customized advertising; and (5) monitor site usage and analyze the behavior of site visitors. We do not collect any personal information through our use of cookies and web beacons, and we do not combine the non-personal information we collect through them with any of your personal information.

You may decline cookies, but by doing so, you may not be able to use certain features on our site. You also may be able to make some web beacons unusable by rejecting cookies. Check the "Help" menu of your browser to learn how to change your cookie preferences.

We may transfer or otherwise disclose information collected from and about you to the following entities for the following purposes: (1) to our service providers, suppliers and business associates, if the disclosure will enable them to fulfill your request for products or services from us for another vendor on our site; (2) to our service providers and business associates, if the disclosure will enable them to perform a business, professional or technical support function for us; (3) to our affiliates and other third parties so that they may contact you with marketing offers of their own; (4) to other companies, credit bureaus or government agencies in connection with issues related to fraud, credit or debt collection; (5) to respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law.

We will periodically email special offers and updates to our customers that have opted-in to receive such email from us. If you do not wish to receive any email offers or updates via email, please click here to opt-out.

Important Information for California Residents
If you are a California resident, this section applies to you. It describes how we collect, use and share personal information of California residents, and their rights with respect to their personal information, as defined under the California Consumer Privacy Act of 2018 (“CCPA”).

Your Privacy Rights
As a California resident, you have the following rights in connection with your personal information (collectively, "Privacy Rights"):

- **Access/Portability.** You have the right to request and receive a copy of your personal information we have collected, used, disclosed and sold within the previous 12 months. You can also view and manage most of your personal information by logging into your account.

- **Deletion.** You have the right to request the deletion of your personal information we collect and maintain. Please be aware that deleting your personal information is irreversible and means that you will no longer have an account with us. By submitting a deletion request, you will be deleting your entire account including any member credits, reward points, and order history. If you have any member credits on your account, those credits will be deleted and can no longer be used. If you chose to use our Site at a later time, you will need to sign up again and create a new account.
• **Opt-Out.** You have the right to opt-out of the sale of your personal information. Please note, we do not sell any of your personal information to third parties for profit. Like most online businesses, we do share some information with contracted third parties in order to provide better services and advertising to you. California law may classify our limited sharing with these contracted third parties as a “sale” of personal information, and we do afford you the option to opt-out of sharing this information. You also have the ability to restrict the use of cookies and advertising IDs:
  - You can use your browser’s settings to clear, delete or prevent cookies. We cannot control cookies that you have stored on your browser and recommend deleting all current cookies. Instructions for how to do this on different types of browsers can be found here: https://www.allaboutcookies.org/manage-cookies/.
  - We use Google Ads and Google Analytics to serve and measure advertising. Please go here and here to opt-out of any personalized ads and cookies.
  - We may also use Facebook to help serve advertising. Please go here to control Facebook’s use of cookies.
  - You may also find more information on our use of cookies and how to manage them in the Sections titled “Cookies and Web Beacons” and “Opting Out.” above.
    Please be aware that after submitted an Opt-Out request, you may still continue to see advertisements regarding our company online or through third parties. If you continue to visit or use the Site, you may also come across our ads. You will no longer receive personalized advertisements, but you may still see generic, non-personalized advertisements.
• **Non-Discrimination.** You have the right to exercise any of your Privacy Rights free from discriminatory practices prohibited by California law.

*How To Exercise Your Privacy Rights*

To submit a privacy related request, you may call us at 8005234448 - 9pm EST / 7 days a week, email us at SFCPrivacy@shoesforcrews.com.

Prior to processing, we will authenticate your request through our standard verification procedures, such as by requesting you to log in to your account or by verifying the information you provided in your request with your account information we have on file. This information may include first name, last name, email and phone number. Please be aware that this information will only be used to verify and help process your request. However, we are required by law to keep information related to your request for record keeping purposes.

Please allow up to 15-45 days for us to complete your request. Please note, these Privacy Rights are subject to exceptions, and in certain cases we may decline your request as permitted by law.

You may also allow an authorized agent to submit privacy related requests on your behalf. If you would like to do so, please submit a signed Power of Attorney naming the person who will be your authorized agent. This person may then submit privacy related requests on your behalf using any of the available methods we offer. Please mail the signed Power of Attorney to Attn: Legal Department - Privacy Request, Shoes For Crews, 5000 T-Rev Avenue, 200, Boca Raton, FL 33431

*Personal Information Collected or Shared in the Preceding 12 Months*

The following chart below summarizes the categories of personal information we collect and share, as well as where we collect it from, how we use it, and who we share it with. For more information on: the categories of information we collect, please see the Section titled “Information We Collect”; the business and commercial purposes for which we collect your personal information, please see the Section titled “How We Use Your Information”; or the categories of third parties with whom personal information is shared or sold, please see the Section titled “How Is This Information Shared”.

---

- Opt-Out. You have the right to opt-out of the sale of your personal information. Please note, we do not sell any of your personal information to third parties for profit. Like most online businesses, we do share some information with contracted third parties in order to provide better services and advertising to you. California law may classify our limited sharing with these contracted third parties as a “sale” of personal information, and we do afford you the option to opt-out of sharing this information. You also have the ability to restrict the use of cookies and advertising IDs:
  - You can use your browser’s settings to clear, delete or prevent cookies. We cannot control cookies that you have stored on your browser and recommend deleting all current cookies. Instructions for how to do this on different types of browsers can be found here: [https://www.allaboutcookies.org/manage-cookies/](https://www.allaboutcookies.org/manage-cookies/).
  - We use Google Ads and Google Analytics to serve and measure advertising. Please go to [this](https://www.allaboutcookies.org/manage-cookies/) and [this](https://www.allaboutcookies.org/manage-cookies/) to opt-out of any personalized ads and cookies.
  - We may also use Facebook to help serve advertising. Please go to [this](https://www.allaboutcookies.org/manage-cookies/) to control Facebook’s use of cookies.
  - You may also find more information on our use of cookies and how to manage them in the Sections titled “Cookies and Web Beacons” and “Opting Out.” above.
    Please be aware that after submitted an Opt-Out request, you may still continue to see advertisements regarding our company online or through third parties. If you continue to visit or use the Site, you may also come across our ads. You will no longer receive personalized advertisements, but you may still see generic, non-personalized advertisements.
• **Non-Discrimination.** You have the right to exercise any of your Privacy Rights free from discriminatory practices prohibited by California law.

*How To Exercise Your Privacy Rights*

To submit a privacy related request, you may call us at 8005234448 - 9pm EST / 7 days a week, email us at SFCPrivacy@shoesforcrews.com.

Prior to processing, we will authenticate your request through our standard verification procedures, such as by requesting you to log in to your account or by verifying the information you provided in your request with your account information we have on file. This information may include first name, last name, email and phone number. Please be aware that this information will only be used to verify and help process your request. However, we are required by law to keep information related to your request for record keeping purposes.

Please allow up to 15-45 days for us to complete your request. Please note, these Privacy Rights are subject to exceptions, and in certain cases we may decline your request as permitted by law.

You may also allow an authorized agent to submit privacy related requests on your behalf. If you would like to do so, please submit a signed Power of Attorney naming the person who will be your authorized agent. This person may then submit privacy related requests on your behalf using any of the available methods we offer. Please mail the signed Power of Attorney to Attn: Legal Department - Privacy Request, Shoes For Crews, 5000 T-Rev Avenue, 200, Boca Raton, FL 33431

*Personal Information Collected or Shared in the Preceding 12 Months*

The following chart below summarizes the categories of personal information we collect and share, as well as where we collect it from, how we use it, and who we share it with. For more information on: the categories of information we collect, please see the Section titled “Information We Collect”; the business and commercial purposes for which we collect your personal information, please see the Section titled “How We Use Your Information”; or the categories of third parties with whom personal information is shared or sold, please see the Section titled “How Is This Information Shared”.

---
<table>
<thead>
<tr>
<th>Categories of Personal Information Collected and Shared</th>
<th>Sources of Personal Information</th>
<th>Purposes for Collection of Personal Information</th>
<th>Categories of Third Parties with Whom We Share the Personal Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name, email address, customer ID, mailing address, phone number, photos and/or Facebook username and profile picture</td>
<td>This information has either been provided to us by you directly, or, with your permission, service providers or contracted third-party providers, such as customer review platforms, and marketing and advertising partners.</td>
<td>To create your account; to provide and improve the Services, such as fulfilling and tracking your orders; to improve customer experience on the Site; to prevent fraud and ensure the security of your account and our Services; and to provide and improve advertisements.</td>
<td>Service providers, such as customer service partners, shipping partners, payment processors, analytics and data warehousing partners; and contracted third-party providers, such as marketing and advertising partners.</td>
</tr>
<tr>
<td>Demographic information such as gender, birthday and other personal identifiers</td>
<td>This information has either been provided to us by you directly, or with your permission, service providers or contracted third-party providers, such as marketing partners.</td>
<td>To provide and improve the Services; to improve customer experience on the Site; and to provide and improve advertisements.</td>
<td>Service providers, such analytics and data warehousing partners; and contracted third-party providers, such as marketing partners.</td>
</tr>
<tr>
<td>Commercial information such as order history, order ID, items purchased, size, style and product preferences, other unique identifiers, and inferences drawn therefrom</td>
<td>This information has either been provided to us by you directly, or with your permission, your browser, computer or mobile device, service providers, and contracted third-party providers, such as marketing and advertising partners.</td>
<td>To provide and improve the Services; to improve customer experience on the Site; and to provide and improve advertisements.</td>
<td>Service providers, such as customer service partners, analytics and data warehousing partners; and contracted third-party providers, such as marketing and advertising partners.</td>
</tr>
<tr>
<td>Geolocation information</td>
<td>This information is either provided to us by you directly or with your permission, your browser, computer or mobile device.</td>
<td>To provide and improve the Services; to improve customer experience on the Site; to prevent fraud and ensure the security of your account and our Services; and to provide and improve advertisements.</td>
<td>Service providers, such as analytics and data warehousing partners; and contracted third-party providers, such as marketing and advertising partners.</td>
</tr>
<tr>
<td>-------------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>IP address, cookies, advertising IDs, tracking pixels, and other unique identifiers</td>
<td>This information has either been provided to us by you directly, or with your permission, your browser, computer or mobile device, service providers, or contracted third-party providers, such as marketing and advertising partners.</td>
<td>To provide and improve the Services; to improve customer experience on the Site; to prevent fraud and ensure the security of your account and our Services; and to provide and improve advertisements.</td>
<td>Service providers, such as customer service partners, and analytics and data warehousing partners; and contracted third-party providers, such as marketing and advertising partners.</td>
</tr>
<tr>
<td>Internet activity information such as how a user browses and interacts with our Services, Site and advertisements, and device, browser and/or computer properties</td>
<td>This information has either been provided to us by you directly, or with your permission, your browser, computer or mobile device, service providers, or contracted third-party providers, such as marketing and advertising partners.</td>
<td>To provide and improve the Services and the Site; to improve customer experience on the Site; to provide, improve, and resolve errors; to prevent fraud and ensure the security of your account and our Services; and to provide and improve advertisements.</td>
<td>Service providers, such as customer service partners, and analytics and data warehousing partners; and contracted third-party providers, such as marketing and advertising partners.</td>
</tr>
</tbody>
</table>

For users who require access to this Policy in an alternative format, please visit our Accessibility page for more information.

If you have any questions or concerns about this Privacy Policy or our privacy practices, you may contact us at 8005234448.

Further, under California Civil Code sections 1798.83-1798.84, if you are a California resident and have an established business relationship with us, you can request a notice disclosing the categories of personal information we have shared with third parties, for the third parties’ direct marketing purposes, during the
preceding calendar year. To request a notice, please submit your request to Shoes For Crews, Attn: Legal Department, California Shine the Light Inquiry, 5000 T-Rex Avenue 200, Boca Raton, FL 33431

EU-US Privacy Shield Program
Shoes For Crews complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and the United Kingdom to the United States in reliance on Privacy Shield. Shoes For Crews has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit https://www.privacyshield.gov/

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, Shoes For Crews is subject to the regulatory and enforcement powers of the U.S. Federal Trade Commission.

Types of Data Collected Under the EU-US Privacy Shield
The following personal data may be collected from EU and UK customers: your name, email address, mailing address, and IP address are collected. This personal data is used for the following purposes: marketing and sales, internal research, and compliance with federal, state and local laws and regulations. Shoes For Crews also collects aggregate data such as your Site preferences, sizes, gender, geographical location, language, and time zone. This aggregate data is used for the following purposes: marketing and sales activities, to optimize shopping experience and types of goods sold, internal research, partnerships or agreements with affiliates, agents and business partners, and to describe our Services to current and prospective business partners.

Who We Share Information With Under the EU-US Privacy Shield
Shoes For Crews may disclose personal and non-personally identifiable aggregate data with affiliates, subsidiaries, business partners, advertisers and vendors. The purpose for disclosure to affiliates, subsidiaries and business partners is to improve customer experience, for internal research and marketing and sales purposes. We may share information with advertisers and vendors to comply with lawful agreements and for advertising purposes. Shoes For Crews’s accountability for personal data that it receives in the United States under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, Shoes For Crews remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process personal data on its behalf do so in a manner inconsistent with the Principles, unless Shoes For Crews proves that it is not responsible for the event giving rise to the damage.

Shoes For Crews may also be required to disclose personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

Individuals will be notified by Shoes For Crews, via email and certified mail in the event it uses or discloses information for a purpose other than that for which the information was originally collected or discloses information to a non-agent third party.

Accessing and Updating Your Personal Information
You have the right to access, correct or delete personal data which has been provided to Shoes For Crews. At any time, you may update or correct your online account information by logging into your account and navigating to the “My Account” page or by contacting us. You may also delete your personal data by contacting us to deactivate your account, but note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

If you do not want Shoes For Crews to use or disclose your information or provide your information to third parties for marketing and sales purposes, please contact Shoes For Crews at the address provided below under “Inquiries or Complaints Regarding the EU-US Privacy Shield Program”. If you have already received
a non-administrative communication that you did not wish to receive, you may opt-out by clicking the unsubscribe link or by following the instructions included in the communication.

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to SFCPrivacy@shoesforcrews.com.

Inquiries or Complaints Regarding the EU-US Privacy Shield Program
In compliance with the EU-US Privacy Shield Principles, Shoes For Crews commits to resolve complaints about your privacy and our collection or use of your personal information. European Union and UK individuals with inquiries or complaints regarding this Privacy Policy should first contact Shoes For Crews at:
Shoes For Crews LLC.
Attn: Legal Department
5000 T-Rex Avenue, 200
Boca Raton, FL 33431
United States of America

Shoes For Crews has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit http://www.bbb.org/EU-privacy-shield/for-eu-consumers for more information and to file a complaint. This service is provided free of charge to you.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at https://www.privacyshield.gov/article?id=ANNEX-I-introduction.

Nevada Residents
If you are a Nevada resident and have provided us with any personal identifying information, you may opt-out of sharing your information with third parties if you submit an opt-out request to the following email address SFCPrivacy@shoesforcrews.com. Please note we do not sell any of your personal information for profit, we do share some information with contracted third parties in order to provide better services and advertising to you. Please allow 60 days for completion of such request.

Amendments or Modifications to this Privacy Policy
We reserve the right to amend this Privacy Policy at any time without prior notice. Notice of any change will be posted on this Site. Please check this page periodically for changes. Your continued use of the Site after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

Contact Us
If you have any questions regarding the use of our Site or Privacy Policy, please contact us at:
Shoes For Crews, LLC.
Attn: Legal Department
5000 T-Rex Avenue, 200
Boca Raton, FL 33431
United States of America

Updated on 4/6/2020