

Cool Audrey Privacy Policy

Effective Date: May 19, 2020

Cool Audrey, Inc. ("**Company**" or "**We,**" "**Us,**" or "**Our**") respects your privacy and We are committed to treating the personal and corporate information of our clients and website users with respect and sensitivity and in compliance with this policy.

This policy describes the types of information We may collect from you and that you may provide when you visit, www.coolaudrey.com (our "**Website**"), and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information We collect:

- On our Website.
- In email, text, and other electronic messages between you and this Website or Us.
- In person directly from you or from your employer.

It does not apply to information collected by:

- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on our Website.

Please read this policy carefully to understand our policies and practices regarding your information and how We use and retain it. If you do not agree with our policies and practices, your choice is not to use our Website and not communicate with Us by email or text. By accessing or using this Website or communicating with Us by email or text, you agree to this privacy policy. Please visit this policy regularly as We may make changes and update it from time to time (see Changes to Our Privacy Policy). Your continued use of this Website and communication with Us by email or text after We make changes is deemed to be acceptance of those changes.

Children Under the Age of 18

Our Website is not intended for children. We do not knowingly collect information from children under 18 years of age. No one under age 18 may provide any information to Us through our Website or by email or text.

Information We Collect About You and How We Collect It

We may collect several types of information from and about Website users, and those who use the functionality of contacting Us through our Website forms, as well as when you email or text Us and when We interact with you in person. This includes:

- Information that may personally identify you, such as your name, e-mail address, postal address, telephone number, other information for contacting you online and offline, and information you submit to Us through our Website forms ("**Personal Information**");
- Information about your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to Us or use Our Website.
- From third parties, for example, your employer or other business partners.

Information You Provide to Us

The information We collect on or through our Website or in person may include:

- Information that you provide directly to Us in person, by email, by postal mail or by filling in forms on our Website.
- Records and copies of your correspondence (including email addresses and postal addresses), you provide through our Website forms or otherwise to Us through email or postal mail
- Your responses to surveys or other inquiries requesting responses from you We may make available to you via forms on our Website.

Information That May Be Collected Through Automatic Data Collection Technologies

We do not collect Personal Information automatically, but as you navigate through and interact with our Website, automatic data collection technologies employed by providers who host and provide services to Us to provide our Website and to facilitate our services, including webinars, may collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on our Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information collected may inform analytics provided to Us. We use analytics to help Us understand usage and improve our Website. These technologies:

- Estimate our Website audience size and usage patterns.
- Store information about your preferences, for customizing our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies used for automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting this may limit the functionality of our Website. Unless you have adjusted your browser setting to refuse cookies, cookies are issued when you direct your browser to our Website.

- **Web Beacons.** Pages of our Our Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit counting users who have visited those pages and for other related Website statistics (for example, recording the popularity of certain Website content and verifying system and server integrity).

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications on our Website are served by third-party application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your Personal Information or they may collect information, including information that may be Personal Information under certain laws, about your online activities over time and across different websites and other online services.

When We can, We limit tracking technologies on Our Website, but We do not control all third parties' tracking technologies or how they may be used. If you have any questions about an application you should review their privacy policies and contact them directly.

How We Use Your Information

We use information that We collect about you or that you provide to Us, including any Personal Information:

- To present our Website and its contents to you.
- To provide you with information or services that you request from Us.
- To respond to your inquiries and communications to Us;
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and Us, or between your employer and Us, including for billing and collection.
- To notify you about changes to our Website or any services We may offer or provide though it or otherwise.
- In any other way We may describe when you provide the information to Us.
- For any other purpose with your consent.

Disclosure of Your Information

We may disclose Personal Information that We collect or you provide as described in this privacy policy to ensure We provide you with access to our Website and its content and to provide a means for you to communicate with Us, including:

- To partners, contractors, service providers, and other third parties We use to support our business and to provide our Website and services and to ensure you receive information about our services.

- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Cool Audrey's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Cool Audrey about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by Us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- If We believe disclosure is necessary or appropriate to protect the rights, property, or safety of Cool Audrey, our Website users, clients, or others.

Our Basis for Use of Your Information

We limit Our use of your information, including your Personal Information, to the purpose(s) for which you provided it to Us or for which We collected it from you or from your employer.

We may use your Personal Information with your consent; when necessary to provide you a requested service or to perform a contract to which you or your employer is party; to comply with a legal obligation; to protect your vital interests or those of another individual, as may be applicable in a given situation; or for Our legitimate interest but only when those interests are not overridden by your interests or your fundamental rights and freedoms.

How Long We Retain Your Information

- **Correspondence and Inquiries.** We retain your correspondence and inquiries for as long as it takes to respond to your inquiries and to engage with you and for up to seven (7) years after receipt, at which point We will delete your information.
- **Mailing Lists.** We retain the information you provided for Our mailing list until you unsubscribe from receiving emails from Us or We stop Our mailings.
- **Contracts Information.** When you or your employer contracts with Us for a service, We will retain that information for a minimum of seven (7) years following the end of the fiscal year in which the contract was signed, as required for record-keeping for tax purposes.
- **Otherwise.** In any other circumstance, We will retain your information for no longer than is necessary, taking into account any relevant circumstances.

Choices About How We Use and Disclose Your Information

It is important to Us that you have opportunity to make choices about Personal Information you provide to Us. The following mechanisms provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Promotional Offers from Us.** If you do not wish Us to send you email to promote our own or third parties' products or services, you can opt-out by checking the relevant box located on the form on which We collect your data or by sending Us an email stating your request to hello@coolaudrey.com. If We have sent you a promotional email, you may send Us a return email asking to be omitted from future email distributions. This opt out does not apply to information We provide about an experience with Our services or that is related to a service or product purchase.

While we do not control third parties' collection or use of your information to serve interest-based advertising through third party cookies, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website (<https://optout.networkadvertising.org/?c=1#!%2F>).

We use Google Analytics, a web analysis service provided by Google Inc. ("Google"). Google Analytics works using cookies. You can prevent Google Analytics cookies from being stored by setting your browser software accordingly. You can also opt-out of Google Analytics by downloading and installing the browser plug-in available at [google.com](https://tools.google.com/dlpage/gaoptout) (<https://tools.google.com/dlpage/gaoptout>).

Rights Related to Your Information

Depending on your geographic location, you may have additional rights and choices. We are committed to respecting your rights under applicable laws and will respond to your requests related to rights you may have in compliance with applicable laws.

To make a request under applicable law, send Us an email at hello@coolaudrey.com. Pursuant to applicable law, after timely acknowledging receipt of your request, we may verify your identity before responding and may request additional information for this purpose.

Accessing and Correcting Your Information

You may send Us an email at hello@coolaudrey.com to request access to, correction or deletion of any Personal Information that you have provided to Us. Though We strive to meet your requests, in certain circumstances, as allowed by and pursuant to applicable law, We may not accommodate a request. For example, We may not be able to delete your Personal Information if We need it to ensure We meet Our service agreement with you, or We may be precluded from correcting your Personal Information if We believe the change would violate a law or legal requirement or cause the information to be incorrect.

International Users and Data Transfers

We are located in the United States. By choosing to access Our Website or provide Personal Information to Us from the European Union, Australia, Asia, or any other region with laws or regulations governing personal data collection, use, and disclosure that differ from United States laws, you are transferring your personal data to the United States which does not have the same data protection laws as such other regions. Personal Information (including that defined as “personal data” by certain laws) collected as described in this policy may be stored and processed in the United States, and by providing Us information and using our Website and agreeing to this policy, you consent to any such transfer of information outside of your home country. If you wish to withdraw your consent to such transfer of information, you can request that We delete your information by sending an email to hello@coolaudrey.com.

Data Security

We are committed to safeguarding your Personal Information and partner with providers who use commercially reasonable security measures, but We cannot guarantee the security of Personal Information transmitted through our Website or through email or by text. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our Website. For information you provide to Us in person, We deploy administrative and physical controls to safeguard and protect it from unauthorized disclosure.

Changes to Our Privacy Policy

It is our policy to post any changes We make to our privacy policy on this page. If We make material changes to how We treat our Website users' Personal Information or information collected from clients, We will notify you through a notice on our Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this privacy policy to check for any changes.

Contact Information

To ask questions or provide comments regarding this privacy policy and our privacy practices, to request rights that may be available to you under applicable laws, or to register a concern, contact Us at: hello@coolaudrey.com.