

SmartAssBrand Privacy Policy

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Welcome. SmartAssBrand LTD (“SmartAssBrand,” “we,” “us,” or “our”) is the owner of the website www.SmartAssBrand.com and any associated webpages and domains (collectively, the “Site”). Any person accessing our Site, including use of any of our service through a mobile device, tablet, mobile application or otherwise, is referred to as “you” or “your”. We take the privacy and security of your personal information very seriously. Our Privacy Policy is lengthy, but we recommend that you read all of it so that you clearly understand the types of information we may collect from you via this Site, how this information may be used, disclosed and safeguarded, and how you can control its use. We will not use or share your information with anyone except as described in this Privacy Policy. This Privacy Policy is a part of Our Terms of Service. By visiting and/or using our Site, you agree to be bound by the Terms of Service and provide consent to the practices described in this Privacy Policy. Capitalized terms used here and defined in the Terms of Service shall have the meanings set forth in the Terms of Service.

Information Collection: when you visit our Site and / or use our services we may collect your personal information when you provide it to us, as well as obtain information from you automatically (e.g. by utilizing “Cookies”).

HOW WE COLLECT PERSONAL INFORMATION We collect information from you when you choose to provide it to us. This includes, but is not limited to, personally identifiable information (“Personal Information”), such as your full name, your gender, a user name and password, email address, phone number, physical address, credit card information and other billing information. We may also collect personally identifiable information from or regarding other people when you choose to provide it to us (see section below “SENDING GIFTS”). Examples of ways in which we may collect such information from you include the following:

- **REGISTERING OR UPDATING AN ACCOUNT** Before using certain parts of this Site or ordering products or services, you must create an account via our Site. This will require you to provide certain Personal Information, which is used for billing purposes, to fulfill your orders, to communicate with you about your order and this Site, and for other internal business purposes. If you choose to update or change this information, we will collect this information for the same aforementioned purposes. If you create an account using your login from a third party service, like Facebook or Twitter, we will access and collect the information that your privacy settings on that third party service permits us to access so that we can create your account for you.
- **SENDING GIFTS** We offer account holders the ability of sending gifts (e.g. a pair of underwear) to another person, such as a friend or family member. To send a gift to another person, you must provide us with a full name and delivery address. This information does not necessary need to be personally identifiable to the person you wish to send the gift to. However, if the name and delivery address you provide us with is not the name and delivery address of the person whom you wish us to send the gift to, then we might not be able to send the gift directly to this person.
- **CUSTOMER SERVICE** In order for us to provide customer service, we may request Personal Information from you. Customer service includes any means of communication via our Site or via our contact information provided by this Site. The information requested might vary depending on what you would like assistance with. Providing this information is always voluntary, however not providing this information might result in us not being able to fulfill your request.
- **MARKETING EMAILS** We may send marketing and / or promotional emails to the email address you provide to us. You can choose not to receive these emails by clicking the unsubscribe link provided in such communications. Please note that despite unsubscribing from such marketing communications, we may still contact you in relation to your order(s) or

any issues relating any business you conduct with us. We oppose spamming and have no intention of sending unsolicited commercial emails to you. In case you do by mistake receive spam messages, you may contact us at any time.

- **ADDITIONAL MEANS OF COLLECTING INFORMATION** Our Site may utilize cookies, web beacons (also called pixel tags, web bugs, Internet tag, and clear GIF) or other technologies to automatically collect certain information when you visit or use our Site, or interact with our emails on or from our Site or other websites. Web beacons are used to transmit information back to a web server and are often used in conjunction with cookies to understand how visitors interact with the pages and content on the pages of the website. Like many other websites, we use a standard technology called "Cookies" (also referred to as HTTP cookie, web cookie, and browser cookie). Cookies are small pieces of information sent to your browser from a web site and stored on your computer's hard drive. **LOG DATA** We collect information that your browser sends whenever you visit our Site ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

COOKIES We may use first-party and third-party cookies, as well as the DoubleClick cookie to collect information. Cookies helps us obtain information about how you use our Site, such as what sections and URL's of our Site you visit, how long you spend on each particular section, the number of times you return, and other Site usage data. Service Providers may also use cookies to collect information on your usage behavior on our Site. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site. **How We Use Your Information** We may use information we obtain about you to: 1. Allow you to create a user account, and to connect this account with social networks, such as Facebook, Instagram, and Twitter 2. Process and fulfill your orders, including tracking your order and arranging any handling refunds and returns 3. Send you marketing and promotional emails 4. Maintain a record of your orders and communications with us 5. Provide customer service and technical support 6. Learn more about our Site visitors and their behavioral patterns with regards to our Site and products 7. Allow you to take full advantage of our Referral Program 8. Comply with legal requirements and industry standards and our policies 9. To protect the security of our website 10. Fulfill any other purpose, as described to you at the point of collection **When We Might Share Your Information** We will not share your information with any third parties except as herein disclosed.

SERVICE PROVIDERS We may employ third party companies and individuals to facilitate our Site and services, to provide the Site or our services on our behalf, to perform Site-related services, to assist us in analyzing how our Site is used, to maintain databases, to process credit card payments, to provide fulfillment services, and to email you information. We provide these third parties with only the Personal Information they need to perform their specific function. Included among these service providers are Facebook and Google, which enable us to present you with retargeted advertising on other sites based on your interaction with our Site. You can visit the following page to opt out of Google's targeted advertising and Facebook's here. If you would also like to prevent your data being used by Google Analytics, we recommend that you download and install the Opt Out Browser Add-On.

LEGAL REQUIREMENTS We may disclose your Personal Information if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of SmartAssBrand, (iii) enforce our Terms and Conditions, (iv) act in urgent circumstances to protect the personal safety of users of the Site or the public, or (v) protect against legal liability.

BUSINESS TRANSFERS As with any business, it is possible that as our business develops, we might sell or buy businesses or assets. In the event of a business sale, merger, reorganization, dissolution or similar event, information about our customers may be part of the transferred

assets. IN ANY OTHER INSTANCE, WE WILL NOT SELL YOUR PERSONAL INFORMATION. How We Protect Your Information

PROTECTING YOUR PERSONAL INFORMATION - The security of your Personal Information is important to us, but no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. As a security measure you will need to enter your SmartAssBrand account username and password in order to access and alter your Personal Information on our Site. You should also sign off your account and close your browser window when you have finished your visit to our sites. Please note that we will never ask for your SmartAssBrand account user name or password via email. For further protection, we recommend that you do not share your account username and password with anyone and to keep this information only in a private location.

INTERNATIONAL TRANSFER Your information may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside of the United States and choose to provide information to us, we may transfer Personal Information to the United States and process it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer. We will protect your information as described in this Privacy Policy.

YOUR CONTROL OF YOUR INFORMATION All account holders on our Site may review, update, correct or delete their personal information in their registration profile by contacting us or by making edits via the “My Account” section of this Site. You can completely delete all such information, however your account may then be deactivated and / or you may not be able to purchase or receive our products. We may occasionally send you marketing and promotional emails to the email address you provide us. You can choose not to receive these emails by clicking the unsubscribe link provided in such communications. Please also be reminded that in every case, providing Personal Information is voluntary. However, by choosing not to provide certain Personal Information you might not be able to create a user account, access certain areas of our Site, have customer-service related requests fulfilled, order products, and use other available services and features.

CHILDREN’S POLICY Our Site and services do not address anyone under 13 years of age “Children”. We do not knowingly collect Personal Information from Children. If you are a parent or guardian and you are aware that your Children provided us with Personal Information, please contact us. If we learn that Children provided us with Personal Information, we will delete such information from our servers as quickly as possible.

LINKS TO OTHER SITES Our Site may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over, and assume no responsibility for, the content, privacy policies or practices of any third party sites or services.

CHANGES TO THIS PRIVACY POLICY We reserve the right to make changes to this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

We take the privacy and security of your personal information very seriously. We hope that after carefully reading this Privacy Policy you understand the types of information we may collect from you via this Site, how this information may be used, disclosed and safeguarded, and how you can control its use. Should you still be unclear about any aspect of our Privacy Policy, please contact us (using the contact info below) and provide a description of what you are unclear on for clarification. Please send a letter or email to us using the contact information below:

Privacy Policy Officer
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Thank you for taking the time to read our Privacy Policy. We hope you enjoy the Site and our products.