

Privacy Policy

This Privacy Policy sets out how we, Kardashian Kloset, collect, store and use information about you when you use or interact with our website, <https://kardashiankloset.com> (our website) and where we otherwise obtain or collect information about you. This Privacy Policy was originally posted on August 4, 2019 and has been updated and is effective as of August 31, 2020.

Contents

- Summary
- Our details
- Information we collect when you visit our website
- Information we collect when you contact us
- Information we collect when you interact with our website
- Information we collect when you place an order on our website
- Our use of automated decision-making and profiling
- How we collect or obtain information about you from third parties
- Disclosure and additional uses of your information
- How long we retain your information
- How we secure your information
- Transfers of your information outside the European Economic Area
- Your rights in relation to your information
- Your right to object to the processing of your information for certain purposes
- Sensitive Personal Information
- Changes to our Privacy Policy
- Children's Privacy
- California Do Not Track Disclosures
- California Consumer Protection Act (CCPA)
- Nevada Privacy Law: SB 220
- Brazilian General Data Protection Law (LGPD - Lei Geral de Proteção de Dados Pessoais)
- Copyright, credit and logo



Summary

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. **It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.**

- **Data controller:** Cynthia Bussey.
- **How we collect or obtain information about you:**
 - when you provide it to us (e.g. by contacting us, placing an order on our website).
 - from your use of our website, using cookies and similar technology, and
 - occasionally, from third parties.
- **Information we collect:** name, contact details, payment information e.g. your credit or debit card details, IP address, information from cookies, information about your computer or device (e.g. device and browser type), information about how you use our website (e.g. which pages you have viewed, the time when you view them and what you clicked on, the geographical location from which you accessed our website (based on your IP address)).
- **How we use your information:** for administrative and business purposes (particularly to contact you and process orders you place on our website), to improve our business and website, to fulfil our contractual obligations, to advertise our goods and services, to analyse your use of our website, and in connection with our legal rights and obligations.
- **Disclosure of your information to third parties:** only to the extent necessary to run our business, to our service providers, to fulfil any contracts we enter into with you, where required by law or to enforce our legal rights.
- **Do we sell your information to third parties (other than in the course of a business sale or purchase or similar event):** No.
- **How long we retain your information:** for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business). For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled [How long we retain your information.](#)



- **How we secure your information:** using appropriate technical and organisational measures such as storing your information on secure servers, encrypting transfers of data to or from our servers using Secure Sockets Layer (SSL) technology, encrypting payments you make on or via our website using Secure Sockets Layer (SSL) technology, only granting access to your information where necessary and by only trusted individuals that have been trained and briefed on appropriate handling of personal information.
- **Use of cookies and similar technologies:** we use cookies and similar information-gathering technologies such as web beacons on our website including essential, functional.. For more information, please visit our cookies policy here: <https://kardashiankloset.com/pages/cookie-policy>.
- **Transfers of your information outside the European Economic Area:** we are a company based in the United States. In certain circumstances we transfer your information outside of the European Economic Area, including to the following countries: The United States of America, Canada, Ireland, the United Kingdom. Where we do so, we will ensure appropriate safeguards are in place.
- **Use of automated decision making and profiling:** we use automated decision making and/or profiling. We do this in order to protect our business from harm from fraud during the checkout process via our partner Shopify (privacy policy here: <https://www.shopify.com/legal/privacy>).
- **Your rights in relation to your information**
 - to access your information and to receive information about its use
 - to have your information corrected and/or completed
 - to have your information deleted
 - to restrict the use of your information
 - to receive your information in a portable format
 - to object to the use of your information
 - to withdraw your consent to the use of your information
 - to complain to a supervisory authority



- **Sensitive personal information:** we do not collect what is commonly referred to as 'sensitive personal information'.

Our details

The data controller in respect of our website is Cynthia Bussey. You can contact the data controller by sending an email to info@kardashiankloset.com.

If you have any questions about this Privacy Policy, please contact the data controller.

Information we collect when you visit our website

We collect and use information from website visitors in accordance with this section and the section entitled Disclosure and additional uses of your information.

Web server log information

We use a third party server to host our website called Shopify Inc., the privacy policy of which is available here: <https://www.shopify.com/legal/privacy>. Our website server automatically logs the IP address you use to access our website as well as other information about your visit such as the pages accessed, information requested, the date and time of the request, the source of your access to our website (e.g. the website or URL (link) which referred you to our website), and your browser version and operating system.

Our server is located in the United States of America and Canada and, accordingly, your information is transferred outside the European Economic Area (EEA). For further information and information on the safeguards used, please see the section of this privacy policy entitled Transfers of your information outside the European Economic Area.

Use of website server log information for IT security purposes

Our third party hosting provider collects and store(s) server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of



malicious code, denial of service attacks and other cyber attacks, by detecting unusual or suspicious activity.

Unless we are investigating suspicious or potential criminal activity, We do not make, nor do we allow our hosting provider to make any attempt to identify you from the information collected via server logs.

Legal basis for processing: compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation: we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.

Legal basis for processing: our and a third party's legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: we and our third party hosting provider have a legitimate interest in using your information for the purposes of ensuring network and information security.

Information we collect when you contact us

We collect and use information from individuals who contact us in accordance with this section and the section entitled [Disclosure and additional uses of your information](#).

Email

When you send an email to the email address displayed on our website we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to inquiries and messages we receive and keeping records of correspondence.



Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

We use a third party email provider/customer service management tool to store emails and messages you send us. Our third party email provider is SmarterTrack located in the United States. Their privacy policy is available here

<https://www.smartertools.com/company/privacy-policy>.

Emails you send us will be stored outside the European Economic Area on our third party email provider's servers in the United States and other locations based on their sub-processors. For further information please see the section of this privacy policy entitled Transfers of your information outside the European Economic Area.

Mail

If you contact us by mail, we will collect any information you provide to us in any postal communications you send us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation)

Legitimate interest(s): responding to inquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).



Information we collect when you interact with our website

We collect and use information from individuals who interact with particular features of our website in accordance with this section and the section entitled [Disclosure and additional uses of your information](#).

Registering on our website

When you register and create an account on our website, we collect the following information: email address, IP address, and any other information you provide to us when you complete the checkout form.

If you do not provide the mandatory information required by the registration form, you will not be able to register or create an account on our website.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: registering and administering accounts on our website to [insert purpose e.g. to provide access to content] [and facilitate the running and operation of our business.

Transfer and storage of your information

Information you submit to us via the registration form on our website will be stored outside the European Economic Area on our third party hosting provider's servers in the United States and Canada. Our third party hosting provider is Shopify with servers located throughout North America and where its sub-processors may be located. Their privacy policy is available here: <https://www.Shopify.com/legal/privacy>.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled [Transfers of your information outside the European Economic Area](#).



Information we collect when you place an order on our website

We collect and use information from individuals who place an order on our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

Information collected when you place an order

Mandatory information

When you place an order for goods or services on our website, we collect your name, email address, billing address, shipping address, company name (if applicable), billing name and information about your browser.

If you do not provide this information, you will not be able to purchase goods or services from us on our website or enter into a contract with us.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we need the mandatory information collected by our checkout form to establish who the contract is with and to contact you to fulfil our obligations under the contract, including sending you receipts and order confirmation.

Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation: we have a legal obligation to issue you with an invoice for the goods and services you purchase from us where you are VAT registered and we require the mandatory information collected by our checkout form for this purpose. We also have a legal obligation to keep accounting records, including records of transactions

Processing your payment

After you place an order on our website you will need to make payment for the goods or services you have ordered. In order to process your payment we use a third party payment processor (Shopify Payments) and a fraud gateway to ensure that your order with us is not fraudulent. Your payment will be processed by Shopify Payments.



Shopify Payments collects, uses and processes your information, including payment information, in accordance with their privacy policies. You can access their privacy policies via the following link(s): <https://www.shopify.com/legal/privacy>.

Transfer and storage of your information

Shopify Payments is located in Canada. Information relating to the processing of your payment is stored outside the European Economic Area on our third party payment processor's servers in Canada and the United States.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: to fulfil your contractual obligation to pay for the goods or services you have ordered from us.

Information collected or obtained from third parties

This section sets out how we obtain or collect information about you from third parties.

Information received from third parties

Generally, we do not receive information about you from third parties. The third parties from which we receive information about you will generally include partner companies who we are doing a joint promotion with.

It is also possible that third parties with whom we have had no prior contact may provide us with information about you.

Information we obtain from third parties will generally be your name and contact details, but will include any additional information about you which they provide to us.



Legal basis for processing: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be).

Legal basis for processing: consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: where you have asked that a third party to share information about you with us and the purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third party in question to pass on your information to us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: where a third party has shared information about you with us and you have not consented to the sharing of that information, we will have a legitimate interest in processing that information in certain circumstances.

For example, we would have a legitimate interest in processing your information to perform our obligations under a subcontract with the third party, where the third party has the main contract with you. Our legitimate interest is the performance of our obligations under our sub-contract.

Similarly, third parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.

Where we receive information about you in error

If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information.



Disclosure and additional uses of your information

This section sets out the circumstances in which will disclose information about you to third parties and any additional purposes for which we use your information.

Disclosure of your information to service providers

We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business and who process your information for us on our behalf. These include the following:

- Customer Service System Provider: SmarterTrack. Their privacy policy is available here: <https://www.smartertools.com/company/privacy-policy>.
- Hosting provider(s), including Shopify Inc.. Their privacy policy is available here: <https://www.shopify.com/legal/privacy>.

Our third party service providers are located in the United States and Canada.

Your information will be shared with these service providers where necessary to provide you with the service you have requested, whether that is accessing our website or ordering goods and services from us.

We do not display the identities of all of our service providers publicly by name for security and competitive reasons. If you would like further information about the identities of our service providers, however, please contact us directly via our contact form or by email at info@kardashiankloset.com and we will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such service providers, for example).

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest relied on: where we share your information with these third parties in a context other than where it is necessary to perform a contract (or take steps at your request to do so), we will share your information with such third parties in order to allow us to run and manage our business efficiently.

Legal basis for processing: necessary to perform a contract and/or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation).



Reason why necessary to perform a contract: we may need to share information with our service providers to enable us to perform our obligations under that contract or to take the steps you have requested before we enter into a contract with you.

Disclosure of your information to other third parties

We disclose your information to other third parties in specific circumstances, as set out below.

Transfer and storage of your information

Sharing your information with a prospective or actual purchaser or seller in the context of a business or asset sale or acquisition by us, a merger or similar business combination event, whether actual or potential.

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): sharing your information with a prospective purchaser, seller or similar person in order to allow such a transaction to take place.

Disclosure and use of your information for legal reasons

Indicating possible criminal acts or threats to public security to a competent authority

If we suspect that criminal or potential criminal conduct has occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that we fraud or a cyber crime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: preventing crime or suspected criminal activity (such as fraud).



In connection with the enforcement or potential enforcement our legal rights

We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: enforcing our legal rights and taking steps to enforce our legal rights.

In connection with a legal or potential legal dispute or proceedings

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): resolving disputes and potential disputes.

For ongoing compliance with laws, regulations and other legal requirements

We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one.

Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation(s): legal obligations to disclose information which are part of the laws of the United States of America.



Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: where the legal obligations are part of the laws of another country and have not been integrated into the United States of America's legal framework, we have a legitimate interest in complying with these obligations.

How long we retain your information

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods

Order information: when you place an order for goods and services, we retain that information indefinitely or until you request that we delete, unless this conflicts with our compliance of a legal responsibility.

Correspondence and inquiries: when you make an inquiry or correspond with us for any reason, whether by email or via our contact form, we will retain your information for as long as it takes to respond to and resolve your inquiry and indefinitely afterward unless it is requested to be deleted AND it does not interfere with our compliance with laws and our legitimate business interest.

Criteria for determining retention periods

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);



- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

How we secure your information

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information;
- using Secure Sockets Layer (SSL) software to encrypt any information you submit to us via any forms on our website and any payment transactions you make on or via our website;
- only transferring your information via closed system or encrypted data transfers.

Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.



Transfers of your information outside the European Economic Area

We process data both inside and outside of the United States and rely on legally-provided mechanisms to lawfully transfer data across borders. Countries where we and our data processors process data may have laws which are different, and potentially not as protective, as the laws of your own country.

Your information will be transferred and stored outside the European Economic Area (EEA) in the circumstances set out below. We will also transfer your information outside the EEA or to an international organisation in order to comply with legal obligations to which we are subject (compliance with a court order, for example). Where we are required to do so, we will ensure appropriate safeguards and protections are in place.

Server log information

Information collected when you visit our website is transferred outside of the EEA and stored on the servers of our third party hosting company, Shopify. You can access their privacy policy here: <https://www.shopify.com/legal/privacy>.

Country of storage: Canada and the United States

Safeguard(s) used: secure servers to store your information

Payment Processor

Information you submit to us by our third party payment processor is transferred outside the EEA and stored on their servers. You can access their privacy policy here:

<https://pay.shopify.com/tos-privacy-policy>.

Country of storage: the United States and Canada. These countries are not subject to an adequacy decision by the European Commission.

Safeguard(s) used: secure servers to store your information



Your rights in relation to your information

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by sending an email to info@kardashiankloset.com.

- **to request access to your information** and information related to our use and processing of your information;
- **to request the correction or deletion** of your information;
- **to request that we restrict our use** of your information;
- **to receive information which you have provided to us in a structured, commonly used and machine-readable format** (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third party data controller);
- **to object to the processing of your information for certain purposes** (for further information, see the section below entitled Your right to object to the processing of your information for certain purposes); and
- **to withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

For the purposes of the UK, the supervisory authority is the Information Commissioner's Office (ICO), the contact details of which are available here: <https://ico.org.uk/global/contact-us/>

Further information on your rights in relation to your personal data as an individual

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's website:



- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>; and
- <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available here: http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

Your right to object to the processing of your information for certain purposes

You have the following rights in relation to your information, which you may exercise in the same way as you may exercise by writing to Cynthia Bussey or sending an email to: info@kardashiankloset.com.



- to object to us using or processing your information where we use or process it in order to **carry out a task in the public interest or for our legitimate interests,**

Sensitive Personal Information

‘Sensitive personal information’ is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person’s sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

Changes to our Privacy Policy

We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.



Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.

Children's Privacy

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to info@kardashiankloset.com.

California Do Not Track Disclosures

"Do Not Track" is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user. For information about Do Not Track, please visit www.allaboutdnt.org

For information on how to opt out from our tracking technologies used on our website, see our cookies policy which is available here: <https://kardashiankloset.com/pages/cookie-policy>.

California Consumer Protection Act (CCPA)

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Policy of Cynthia Shahian, LLC d/b/a Kardashian Kloset and its subsidiaries (collectively, "we," "us," or "our") and applies solely to visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the



California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

Information 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 device (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	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.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, 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. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	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	NO



	status, genetic information (including familial genetic information).	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records 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.	NO



K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO
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Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from our customers. For example, from the information that our customers provide to us related to the products for which they purchase from us.
- Indirectly from our customers or their agents. For example, through information, we collect from our clients in the course of providing services to them.
- Directly and indirectly from the activity on our website (www.kardashiankloset.com). For example, from submissions through our website portal or website usage details collected automatically.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to fulfill an order with us.



- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

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

Category A: None.

Category B: None.

Category F: None.



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

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with the products or services we provide to you.

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

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

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:

1. 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.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. 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.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us at:

- Email: info@kardashiankloset.com



Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collect personal information or an authorized representative. Such as:
 - Legal name
 - Any alias name used
 - Physical Address
 - Phone Number
 - Email Address
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a



fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we may notify you by email or through a notice on our website homepage.

Contact Information

If you have any questions or comments about this notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Website: www.kardashiankloset.com

Email: info@kardashiankloset.com

Postal Address: Urban Consulting, LLC

Attn: Cynthia Shahian, LLC d/b/a Kardashian Kloset

3904 Buckingham St.

Farmington, NM 87402



Nevada Privacy Law: SB 220

Nevada law gives Nevada consumers the right to request that a company not sell their personal information for monetary consideration to certain other parties. This right applies even if their personal information is not currently being sold. At this time, <https://www.kardashiankloset.com> does not sell customer's personal information. To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us at:

Email: info@kardashiankloset.com

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

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with the products or services we provide to you.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 60 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

How Do You Access and Update Your Personal Information?

In order to keep your personal information accurate and complete, you can access or update some of it in the following ways:

- If you have created a <https://www.kardashiankloset.com> account, you can log in to review and update your account information, including contact, billing, and shipping information.



How is Your Personal Information Protected?

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information;
- using Secure Sockets Layer (SSL) software to encrypt any information you submit to us via any forms on our website and any payment transactions you make on or via our website;
- only transferring your information via closed system or encrypted data transfers.

Changes to Our Privacy Notice

This policy takes effect immediately and we reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we may notify you by email or through a notice on our website homepage.

For further information on cookies <https://www.kardashiankloset.com> uses, refer to our cookies policy at <https://kardashiankloset.com/pages/cookie-policy>.

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 Information

If you have any questions or comments about this notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under Nevada law, please do not hesitate to contact us at:



Website: www.kardashiankloset.com

Email: info@kardashiankloset.com

Postal Address: Urban Consulting, LLC

Attn: Cynthia Shahian, LLC d/b/a Kardashian Kloset

3904 Buckingham St.

Farmington, NM 87402

Brazilian General Data Protection Law (Lei Geral de Proteção de Dados Pessoais)

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. **It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.**

- **Data protection officer:** Montanna Washburn.
- **How we collect or obtain information about you:**
 - when you provide it to us (e.g. by contacting us, placing an order on our website.)
 - from your use of our website, using cookies and similar technology, and
 - occasionally, from third parties.
- **Information we collect:** name, contact details, payment information e.g. your credit or debit card details, IP address, information from cookies, information about your computer or device (e.g. device and browser type), information about how you use our website (e.g. which pages you have viewed, the time when you view them and what you clicked on, the geographical location from which you accessed our website (based on your IP address)).
- **How we use your information:** for administrative and business purposes (particularly to contact you and process orders you place on our website), to improve our business and



website, to fulfil our contractual obligations, to advertise our goods and services, to analyse your use of our website, and in connection with our legal rights and obligations.

- **Disclosure of your information to third parties:** only to the extent necessary to run our business, to our service providers, to fulfil any contracts we enter into with you, where required by law or to enforce our legal rights.
- **Do we sell your information to third parties (other than in the course of a business sale or purchase or similar event):** No.
- **How long we retain your information:** for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business). For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled [How long we retain your information.](#)
- **How we secure your information:** using appropriate technical and organisational measures such as storing your information on secure servers, encrypting transfers of data to or from our servers using Secure Sockets Layer (SSL) technology, encrypting payments you make on or via our website using Secure Sockets Layer (SSL) technology, only granting access to your information where necessary and by only trusted individuals that have been trained and briefed on appropriate handling of personal information.

Your rights in relation to your information

- o to access your information and to receive information about its use
- o to have your information corrected and/or completed
- o to have your information deleted
- o to restrict the use of your information
- o to receive your information in a portable format
- o to object to the use of your information
- o to withdraw your consent to the use of your information
- o to complain to a supervisory authority



Retention periods

Order information: when you place an order for goods and services, we retain that information indefinitely or until you request that we delete, unless this conflicts with our compliance of a legal responsibility.

Correspondence and inquiries: when you make an inquiry or correspond with us for any reason, whether by email or via our contact form, we will retain your information for as long as it takes to respond to and resolve your inquiry and indefinitely afterward unless it is requested to be deleted AND it does not interfere with our compliance with laws and our legitimate business interest.

Criteria for determining retention periods

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).



How we secure your information

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information;
- using Secure Sockets Layer (SSL) software to encrypt any information you submit to us via any forms on our website and any payment transactions you make on or via our website;
- only transferring your information via closed system or encrypted data transfers.

Data Subject Access Requests (DSARs)

Your rights in relation to your information

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by sending an email to mlw@urbanconsulting.co.

- **access to data** to confirm the existence of the processing of your data;
- **correction of incomplete, inaccurate or out-of-data data**;
- **anonymisation, blocking or deletion** of unnecessary or excessive data or data processed in noncompliance with the provisions of the Law;
- **portability of your data** to another service or product provider, by means of an express request and subject to commercial and industrial secrecy, pursuant to the regulation of the controlling agency;
- **deletion of personal data** processed with the consent of the data subject, except in the situations provided in Art. 16 of this Law;
- **information about public and private entities** with which we shared data;



- **information about the possibility of denying consent** and the consequences of such denial;
- **revocation of consent** as provided in §5 of Art. 8 of this Law.

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

How we verify your identity

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

Response Timing

We will respond to a verifiable consumer request within 15 days of its receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request.



Data Breach Notifications

We will provide you with notifications of a data breach within a reasonable timeframe. Notification may come from us and/or The National Data Protection Authority (Autoridade Nacional de Proteção de Dados or “ANPD”). You may be notified via the contact information you have provided us or by notification on our website, www.kardashiankloset.com.

Contact us

If you have any questions or comments about this notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under Brazilian General Data Protection Law (LGPD - Lei Geral de Proteção de Dados Pessoais), please do not hesitate to contact us at:

Website: www.kardashiankloset.com

Email: mlw@urbanconsulting.co

Postal Address: Urban Consulting, LLC

3904 Buckingham St.

Farmington, NM 87402



Copyright, credit and logo

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