

# Privacy Policy

Updated: July 1, 2021

## I. Introduction

StreetTrend LLC is a fashion footwear and street wear brand portfolio holding company based in New York, NY, U.S.A., that designs, manufactures, distributes, footwear including P448 luxury sneakers at select boutiques and online.

StreetTrend LLC (hereafter, “we,” “us,” “our,” or the “company”) understands that you care about your own personal privacy interests, and we take that seriously. We are committed to respecting your privacy and recognizing your need for appropriate protection and management of Personal Information you share with us. This Privacy Policy describes the company’s policies and practices regarding its collection and use of your personal data and sets forth your privacy rights. This Privacy Policy applies to the company’s online and offline information gathering and dissemination practices in connection with this website [www.us.p448.com](http://www.us.p448.com) (hereinafter, the “Site”) and also any Personal Information we collect or receive through other means.

If you have arrived at this Privacy Policy by “clicking” on an authorized link directing you to a Site operated by the company, then this Privacy Policy applies to you and such Site. This Privacy Policy applies to information we collect about you through our Site and any social media platforms. By using our Site, or sharing your Personal Information with us, you are accepting and consenting to the practices described herein. This Privacy Policy does not apply to any website owned and/or operated by, or on behalf of, any third party, even if we provide a link to such website on our Site. By using our website and registering or creating an account with us, you are agreeing to the terms of this Privacy Policy.

We do not knowingly solicit or attempt to collect personal information from children under thirteen (13) years of age. We urge parents and guardians to participate in their children’s online activities and use parental control or other web filtering technology to supervise children’s access to the Internet. If you are the parent or guardian of an individual under the age of 13 who may have submitted data to us, please contact us to either (i) provide your consent, or (ii) help us identify the data that should be deleted from our systems.

Any questions regarding this Privacy Policy may be directed to us using the contact information provided below.

## II. Information We Collect

We collect both personally identifiable information (“Personal Information”) and non-personally identifiable information. The following is a description of: (i) the categories of Personal Information we may have collected in the preceding 12 months; (ii) the sources from which we may have collected it; and (iii) the business purposes for which we may have collected it.

### A. Information That You Provide To Us Directly.

We collect Personal Information from you when you register or create an account on this Site, place an order with us, request a refund or replacement product, enter a contest or sweepstakes with us, respond to a survey or communication such as e-mail, sign up for our email list or newsletter or SMS messages, or participate in another Site feature, such as Live chat. You may, however, visit our Site without providing such information. If you voluntarily choose to submit or otherwise disclose Personal Information to us, including through the Site, or by regular mail, telephone, fax, e-mail or other electronic means of communication, it is also governed by this Privacy Policy.

In order to purchase products from our Site, you will be prompted to provide certain personal information, including:

- name
- shipping and billing addresses

- phone number
- email address
- optional customer preference data; and
- P448 account username and password.

We do not store or retain any credit card or other billing and payment information. Any on-line payments made through a link from this Site are to a third-party Internet Payment Site (such as Shopify.com, Apple Pay, PayPal, Klarna, etc.) that is outside of this Privacy Policy and is instead governed by its own separate privacy policy.

If you contact or correspond with us by phone or email, we may keep a record of your contact information and correspondence, and we reserve the right to use your contact information, and any other information that you provide to us in your message, to respond thereto. If you wish to change or correct any information you have voluntarily submitted to us, please do so by contacting us in the manner described, below.

## B. Information Collected Through Your Use Of The Site

Like most other websites, our Site collects certain information automatically and stores it in log files. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the use of the Site, including a history of the pages you view. We use this information to help us design our site to better suit our users' needs.

In general, you can visit many of our web pages without telling us who you are or revealing any contact information about yourself. We may track the Internet domain address from which people visit us, other electronic markers and identifiers and other information about our Site and mobile app traffic. We may analyze this data for preferences, trends, site usage statistics and to recognize you or your device. We may also receive usage data from your mobile phone or another device you use to access our Site or our mobile applications, including general location data, which we may also combine with other information.

### 1. IP Address

Each time you visit our Site, we may automatically collect your IP address and the web page from which you came. In order to administer and optimize the Site for you and to diagnose potential issues with our Site, we may use your IP address to help identify you and to gather broad demographic information about you.

### 2. Cookies

We use cookie technology throughout this Site and we may obtain certain types of information when your web browser accesses the Site or advertisements and other content served by or on behalf of the Site. A cookie is a small removable data file that is stored by your web browser on your computer. We use cookies to improve the quality of our service when you visit our Site. We also use cookies to remind us of who you are, tailor our products and services to suit the personal interests of you and others, estimate our audience size, to process your order, track your status in our promotions, contests, and sweepstakes, and/or analyze your visiting patterns. In addition, certain of our Service Providers may use cookies and collect information on our behalf.

However, we respect your right to choose whether to be included in such services. If you would like to opt out of accepting cookies altogether, you can generally set your browser to not accept cookies or to notify you when you are sent a cookie, giving you the chance to decide whether or not to accept it. You can do this through your browser (like Google Chrome, Firefox, or Internet Explorer) settings. Each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookies. For more information on how to modify your browser settings or how to block, manage or filter cookies can be found in your browser's help file or through such sites as: [www.allaboutcookies.org](http://www.allaboutcookies.org). Please note that if you delete, disable, or turn cookies off, you won't have access to many features that make your site experience more efficient and some of our services will not function properly.

The Site also uses the following analytic tools to help us analyze the performance of our Site and services as well as how visitors use our Site and services. The information collected by these tools is aggregated and anonymized.

For example, we use Shopify as an ecommerce platform to power the Site and process customer payments. Shopify places third-party cookies for visitors to the online stores of merchants who use Shopify that are necessary for the functioning of their online stores, reporting, and analytics. However, Shopify does not set advertising cookies through its merchants' online storefronts. For more information on Shopify cookies, please visit [https://www.shopify.ca/legal/cookies?utm\\_medium=Forum&utm\\_campaign=Guru+Ask&utm\\_source=social](https://www.shopify.ca/legal/cookies?utm_medium=Forum&utm_campaign=Guru+Ask&utm_source=social)

We also use Google Analytics and Hotjar to track website activity such as session duration, pages per session, bounce rate, etc., of individuals using the site, along with the high-level information on the source of visitor traffic to our Site. These behavior analytics allow us to better understand our Site visitors' experience and to maintain and make our Site easier to use.

For more information on Google Analytics cookies, visit [www.google.com/policies](http://tools.google.com/dlpage/gaoptout). To opt-out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>. This will allow you to download and install a Google Analytics cookie-free web browser.

For more information on Hotjar behavior analytics, visit <https://www.hotjar.com/privacy/>. To opt-out of being tracked by Hotjar, visit <https://www.hotjar.com/legal/policies/do-not-track/>.

### 3. Web Beacons

Web beacons assist in delivering cookies and help us determine whether a web page on the Site has been viewed and, if so, how many times. For example, any electronic image on the Site can function as a web beacon. We do not track our customers over time and across third party websites to provide targeted advertising and therefore we do not respond to "Do Not Track" or "DNT" signals.

### 4. Third Party Cookies and Web Beacons

We may use third-party advertising companies to help tailor online content to users or to serve ads on our behalf. These companies may employ cookies and web beacons to measure advertising effectiveness (such as which web pages are visited or what products are purchased and in what amount). Any information that these third parties collect via cookies and web beacons is not linked to any personal information collected by us. For example, Facebook collects certain information via cookies and web beacons to determine which web pages are visited or what products are purchased.

### C. Information Provided To Us By Others

If you access our Site or mobile applications with your log-in credentials from a social networking site (such as Instagram, Tik Tok, Facebook, or LinkedIn) or if you otherwise agree to associate your account with us with a social networking site, we may receive personal information about you from such social networking site, in accordance with the terms of use and privacy policy of the social networking site. We may add this information to the information we have already collected from you via stores, Site or mobile applications.

## III. How We Use The Information That We Collect

We may use the Personal Information we collect when you register or set-up an account on our Site, purchase products, request refunds or replacement products, sign up for a newsletter, enter a contest or promotion, respond to a survey or marketing communication, surf the Site, or use certain other Site features in the following ways:

- To personalize your Site experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- To allow us to better service you in responding to your customer service requests.
- To quickly process and fulfill your requested transactions.

- To administer a contest, promotion, survey or other site feature.
- To target in marketing including emails, SMS, display, social or other

Visitors who register on or participate in other Site features will be given a choice whether they would like to be on our e-mail or SMS list and receive e-mail or SMS communications from us. If you have opted-in to receive, we may send you periodic messages.

If you no longer want to receive promotional e-mail from us, please refer to the Opting Out; Updating And Deleting Your Information section below. If you have not opted-in to receive e-mail newsletters, you will not receive these e-mails.

#### IV. **Who We Share Your Information With**

##### A. No Sale of Personal Information to Third-Parties for their Own Use.

We do not sell, trade, or otherwise transfer to Third-Parties for their own use any of your Personal Information, unless we provide you with advance notice and you consent. Except as described in this Privacy Policy, we also do not disclose to Third-Parties any personally identifiable information about your visits to our Site.

Accordingly, there have been no sales of Personal Information to Third-Parties for their own use or further disclosure in the past twelve (12) months. Likewise, the company does not knowingly collect and does not, and will not, sell Personal Information of minors under 16 years of age without affirmative authorization.

##### B. Sharing Personal Information with Affiliates and Service Providers That Help Us Perform Our Business Purposes.

The term "Third-Parties" does not include [www.US.P448.com](http://www.US.P448.com) or our affiliates. It also does not include website hosting partners and other Service Providers who assist us in operating our Site, conducting our business, or providing services to you, so long as those parties agree to keep this information confidential and not use or further disclose it for their own purposes.

We may provide your Personal Information to our Service Providers who help us perform our business purposes, such as:

- Fulfillment Providers, who fulfill orders for our products that you place with us through the Site or otherwise
- Shippers and warehouse operators, who assist us with delivering the products that you request from us through the Site or otherwise
- Technology companies, who assist us in maintaining, protecting, and enhancing our Site and our customer service and communication systems

##### C. Sharing Information with Third-Parties at Your Direction.

We may share your Personal Information with Third Parties to whom you or your agents authorize us in advance to intentionally disclose to or allow to use your Personal Information in connection with services that we provide.

##### D. Monitoring, Enforcement, and Legal Requests.

The company has no obligation to monitor the Site or the use of the Site or to retain the content of any user session. However, we reserve the right, at all times, to monitor, review, retain and/or disclose any information, including Personal Information, as may be necessary to satisfy any applicable law, regulation, legal process or governmental request or to cooperate with law enforcement and other authorities.

We may also use IP addresses to identify a Site user when we feel it is necessary to protect the Site, our service, clients, potential clients or others.

##### E. Sale of our Company or Assets.

In the event of a sale, assignment or transfer of our assets or of any portion of our business, we reserve the right to transfer any and all information that we collect from individuals, or that we otherwise collect in connection with the Site, to unaffiliated third-party purchasers.

F. **Internal Use and Research.**

The company reserves the right to use and disclose de-identified information; anonymized information; aggregated information or publicly available information that has not been combined with non-public Personal Information for purposes including, but not limited to, the company's own internal use, data mining, and research.

Similarly, aggregated, de-identified and non-personally identifiable Site visitor information may be provided to other parties for marketing, advertising, or other uses.

V. **Opting Out; Updating And Deleting Your Information**

We want to communicate with you only if you want to hear from us. If you prefer not to receive direct marketing from us or our affiliates, please send an email to [services@p448.com](mailto:services@p448.com). Please be sure to include your full name, email address, mailing address, and specifically what information you do not want to receive. If you would like to update or correct your email address, mailing address or other contact information with us please contact us the same way. You may also click the designated link at the bottom of all email advertisements to be removed from future email updates or reply stop to any SMS message. Please note that any requests to remove or update your contact information may take up to ten days from the date of your email request to be processed.

California Residents who wish to make a consumer rights Request to Know or Request to Delete their data should follow the instructions in the California Residents section of this Policy, below.

VI. **Protection Of Your Personal Information**

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your Personal Information from unauthorized access, use, or disclosure, we cannot guarantee the security of your Personal Information. Therefore, any information you transmit to us is sent at your own risk.

We also take reasonable steps to physically protect your Personal Information. Only employees who need access to your Personal Information to perform a specific job are granted access.

Our website permits you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, selecting a strong password and constructing a unique password. You are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or P448.com account.

VII. **Other Sites/Links To Third Party Sites**

Our Site may contain links to websites operated and maintained by third parties, over which we have no control. Privacy policies on such linked sites may be different from our privacy policy. You access such linked sites at your own risk. You should always read the privacy policy of a linked site before disclosing any of your information on such site.

VIII. **Changes To Our Privacy Policy**

We may update our Privacy Policy from time to time to reflect changes to our practices, technology, legal requirements and other factors. When changes are made to this Privacy Policy, they will become immediately effective when published. You can check the "Last Updated" legend at the top of this page to see when this Privacy Policy was last revised. The new policy will apply to all current and past users of our Site and will replace any prior policies. Your

continued use of our Site or other services constitutes your acceptance of the practices described in the revised Privacy Policy.

## IX. **Terms Of Use**

Please also visit our Terms of Use section establishing the use, disclaimers, and limitations of liability governing the use of our website. By using our Site, you consent to our Terms of Use.

## X. **Have Questions? Want To Share Your Feedback?**

We welcome your questions, comments, and concerns about privacy. If you have any questions, feedback, or comments about this Privacy Policy or our practices, or if wish to make a request regarding your Personal Information, please contact us as follows:

StreetTrend, LLC

Attention: Privacy Services

Email: [privacy@p448.com](mailto:privacy@p448.com)

Phone: 1-855-956-5135

## XI. **Jurisdiction-Specific Disclosures**

### A. California

1. California Residents: Summary Of Consumer Rights Under The California Consumer Privacy Act ("CCPA")
  - a. Overview

The California Consumer Privacy Act of 2018, Cal. Civ. Code §1798.100 et seq., ("CCPA") took effect on January 1, 2020. The CCPA grants new privacy rights to California consumers, including:

- The right to know what Personal Information is collected, used, shared or sold, both as to the categories and specific pieces of Personal Information;
- The right to delete Personal Information held by businesses and by extension, a business's service provider;
- The right to opt-out of the sale of Personal Information. Consumers are able to direct a business that sells Personal Information to stop selling that information. Children under the age of 16 must provide opt in consent, with a parent or guardian consenting for children under 13; and
- The right to non-discrimination in terms of price or service when a consumer exercises a privacy right under CCPA.

A business subject to the CCPA that collects a California consumer's Personal Information must, at or before the point of collection, inform the consumer as to the categories of Personal Information to be collected and the purposes for which the categories of Personal Information shall be used.

A covered business must disclose and deliver the Personal Information the business collected about the consumer in response to a verifiable consumer request.

For purposes of the CCPA, "Personal Information" does not include:

- Publicly available information from government records;
- De-identified or aggregated consumer information; or
- Information excluded from the CCPA's scope, such as:

- 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 (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

b. Right to Know.

A business subject to the CCPA must disclose in its privacy policy the Personal Information about consumers that the business has collected, sold, or disclosed for a business purpose in the past 12 months.

A business that collects Personal Information must also disclose, in response to a verifiable consumer request, the following:

- The categories of Personal Information the business has collected about the consumer;
- The categories of sources from which that Personal Information is collected;
- The business or commercial purpose for collecting or selling Personal Information collected from consumers;
- The categories of third parties with which the business shares Personal Information;
- The specific pieces of Personal Information the business has collected about the consumer making the request;

A business that sells a consumer's Personal Information or discloses a consumer's Personal Information for a business purpose must disclose the following in response to a verifiable consumer request:

- The categories of Personal Information the business has collected about the individual consumer
- The categories of Personal Information the business has sold about the consumer and categories of third parties to which the Personal Information was sold by category or categories of Personal Information for each third party to which the Personal Information was sold. Or, if the business has not sold any consumer Personal Information, it must state that fact)
- The categories of Personal Information the business has disclosed about the consumer for a business purpose. Or, if the business has not disclosed any consumer Personal Information for a business purpose, it must state that fact.

c. Right to Deletion.

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.

However, the CCPA provides for certain exceptions to the Right to Deletion. 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.

d. Right to Non-Discrimination.

A business must not discriminate against a consumer who exercises any of the consumer's rights under the CCPA. However, a business may charge different prices or provide a different quality of goods or services if the difference is reasonably related to the value provided to the consumer by the consumer's data and may offer financial incentives to a consumer for the collection, sale, or deletion of Personal Information on a prior opt-in consent basis.

e. Right to Opt-Out.

A business that sells consumers' Personal Information to third parties needs to provide notice to consumers thereof and that consumers have the right to opt out of the sale of their Personal Information. A business must provide a "Do Not Sell My Personal Information" link on its Internet homepage that links to an Internet webpage that enables a consumer to opt out of the sale of the consumer's Personal Information.

A business must not sell the Personal Information of consumers if the business has actual knowledge that the consumer is less than 16 years of age, unless the consumer, in the case of consumers between 13 and 16 years of age, or the consumer's parent or guardian, in the case of consumers who are less than 13 years of age, has affirmatively authorized the sale of the consumer's Personal Information.

f. Privacy Policy Requirements.

A business must describe in its online privacy policy or in any California-specific description of consumer privacy rights the following, which must be updated at least once every 12 months:

- Consumers' rights under the CCPA, including the consumer right to opt out of the sale of the consumer's Personal Information and a separate link to the "Do Not Sell My Personal Information" Internet Web page;
- The methods for submitting and verifying consumer requests; and
- A list of the categories of Personal Information that the business has collected about consumers, sold about consumers, and disclosed about consumers for a business purpose in the preceding 12 months

2. California Residents: How To Make A CCPA Consumer Rights Request.

a. Instructions for Submitting a CCPA Consumer Rights Request.

If you wish to exercise any of the CCPA consumer rights summarized above, such as a Request to Know or a Request to Delete Personal Information, you can do so in one of the following ways:

- Click on this link to complete and submit the referenced web form;
- Call us at 1-855-956-5135 or
- Reach us by email at [privacy@p448.com](mailto:privacy@p448.com)

Upon receiving a verifiable Request to Know or a Request to Delete, we will confirm receipt of the request within ten (10) days and provide some information about how we will verify and handle



the request, and by when you should expect to receive a response.

Please note that you may only make a verifiable consumer Request to Know or Request to Access your data under the CCPA two times within any 12-month period.

b. Verification Of The Person Making A Consumer Rights Request.

Of course, we need to be reasonably sure that the person making the request is actually you! So, we may need some information from you to verify that you are the person whose Personal Information you are asking to know about or to delete. Accordingly, the verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- 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.

c. Designating an Authorized Agent to Make a Request for You.

Only you or a person registered with the California Secretary of State that you designate and authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. For your protection, we will need appropriate written proof that someone seeking to act on your behalf is actually authorized by you to do so. You may also make a verifiable consumer request on behalf of your minor child.

d. Response Timing and Format.

We will try to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we need more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt.

If you are making a Request to Delete your Personal Information, we will re-confirm with you that you really want your information deleted after verifying your request.

If we cannot respond to or comply with your Request to Know or Request to Delete, say because we cannot verify your identity or because an exception applies, we will explain the reasons we cannot comply with your request. For data portability requests, we will select a format to provide your personal information that is readily useable 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.

3. California Residents: Shine The Light

Under California's Shine the Light law (California Civil Code Section 1798.83), California residents may ask companies with whom they have formed a business relationship primarily for personal, family or

household purposes to provide the names of third parties to which they have disclosed certain Personal Information (as defined under the Shine the Light law) during the

preceding calendar year for their own direct marketing purposes and the categories of Personal Information disclosed. You may send us requests for this information to [privacy@p448.com](mailto:privacy@p448.com), Attention: Privacy Services. In your request, you must include the statement "Shine the Light Request," and provide your first and last name and mailing address and certify that you are a California resident. We reserve the right to require additional information to confirm your identity and California residency. We are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

## B. United Kingdom and European Economic Area.

By submitting your Personal Information to us you agree to the transfer, storage and processing of your information in a country other than your country of residence including, but not necessarily limited to, the United States. If you reside in the United Kingdom or in Europe, you may have the following rights under applicable law.

### 1. On what legal basis do you collect my information?

To the extent required by applicable law, we will collect your personal information with your consent where required and in accordance with our legitimate need to provide you our Services.

Under European Union law, StreetTrend is required to rely on one or more legal bases to collect, use, share, and otherwise process the information we have about you. We describe these legal bases and some accompanying examples in more detail below.

#### a. Your Consent

StreetTrend processes certain Personal Information based on your consent, which you may revoke at any time. For example:

- we use your information in order to create and maintain your P448 account;
- we use your information to verify your identity (for example when you return to the website and have already logged in);
- we use your information in order to process and deliver your orders and fulfill other requested transactions;
- we use your information to inform you about products, services or promotional offers that you might find interesting if you have chosen to receive these types of communications;
- we use cookies and similar technologies, as described in more detail in our Cookie Policy, based on your consent; and
- we will send you marketing communications where you have consented to receiving such communications in accordance with applicable law.

#### b. Legal Obligation

StreetTrend may process your information in order to comply with a legal obligation, a court order, or to exercise and defend legal claims. For example:

- we may preserve and disclose your information if it is necessary to respond, based on applicable law, to a valid legal request (e.g. a subpoena, search warrant, court order, or other binding request from government or law enforcement); and
- we may retain and process your information where it is necessary for compliance with applicable tax laws.

#### c. Legitimate Interests

We may process your information where it is necessary for the purposes of StreetTrend's or a third party's legitimate interests, such as other customers or visitors to the Site. More specifically, we process your information in furtherance of the following legitimate interests:

- we use your information because it is necessary to pursue our and our legitimate interests in ensuring the Site is secure, such as implementing and enhancing security measures and protections, protecting against fraud, spam and abuse, and enforcing our Terms of Use.
- we use your information to provide our services, including any personalized services, and to understand and improve our business and our customer relationships.
- we rely on our legitimate interests in marketing and promoting our Services to use
- your contact information and send you marketing communications in accordance with applicable law, except where applicable law requires that we rely on your consent to send such communications.
- where required for legal and safety reasons, we may disclose information to law enforcement and related agencies and authorities in furtherance of the legitimate interests described further below.

As detailed in the Privacy Policy, where we process your information based on legitimate interests, you have the right to object to such processing. Where you exercise your right to object, we will cease processing your information for that specific purpose, unless there are compelling legitimate grounds overriding your objection or where your information is processed for legal reasons.

## 2. Retention of Personal Information

Your Personal Information will not be kept for longer than is necessary to fulfill the specific purposes outlined in this Privacy Policy, and to allow us to comply with our legal requirements.

## 3. Who we share your Personal Information with?

As detailed in the “Who We Share Your Information With” section, above, we may share your Personal Information with our affiliates, Service Providers, and as may be required by applicable law. We do not sell or share your Personal Information to others for their own use or further disclosure.

## 4. What are my rights?

You benefit from a number of rights in relation to your information that we process. While some of these rights apply generally, certain rights apply only in certain limited cases. We describe these rights below. In certain cases, such as for access to, rectification or deletion of your information, please be sure to read the options you have under the “Opting Out; Updating And Deleting Your Information” section above.

### a. Access.

You may contact us at [privacy@p448.com](mailto:privacy@p448.com) to request a copy of your Personal Information. If requested and required to do so by applicable law, we will provide your information in an easily accessible format and assist in transferring some of this information to third parties as you request.

### b. Rectify, restrict, delete.

Please read the options you have under the “Opting Out; Updating And Deleting Your Information” section above.

### c. Object.

If we process your Personal Information based on our legitimate interests explained above, you can object to this processing in certain circumstances. In such cases, we will cease processing your information unless we have compelling legitimate grounds to continue processing (including if we are permitted to continue processing under applicable law) or where it is needed for legal reasons. Again, please be sure to read the options you have under the “Opting Out; Updating And Deleting Your Information” section above..

d. Revoke consent.

Where consent is required for processing under applicable law, you may have the right to withdraw your consent to the processing of your Personal Information at any time. If you withdraw your consent to the use of your information for the purposes set out in this Privacy Policy, you may not have access to all (or any) of our services and we might not be able to process or fulfill all (or any) of the transactions you request under this Privacy Policy. In certain cases, we may continue to process your information after you have withdrawn consent if we have a legal basis to do so, or if your withdrawal of consent was limited to certain processing activities.

5. Complaints.

If you have any complaints about how we handle your Personal Information, please contact us so we can resolve the issue where possible. You also have the right to lodge a complaint about any use of your Personal Information with the [Information Commissioner's Office](#) (ICO), the UK data protection regulator, or the [Data Protection Commission](#) (DPC) in Ireland.