

# SENECA

## PRIVACY POLICY

**Date: 10/25/2021**

Seneca ("we," "us" or "our") strives to protect the personal information and right to privacy of users and/or visitors (collectively, "you" or "your"). This Privacy Policy explains how and why we collect, share and use certain information from and about you, and how you can exercise your privacy rights. Please take your time to carefully read this Privacy Policy (effective as of the date set forth above) to ensure you fully understand our views and practices regarding your personal data.

This Privacy Policy applies to all information we collect from and about you through website (the "Site" or "Website", located at [www.thinkseneca.com](http://www.thinkseneca.com)); through promotional or marketing events; by phone, mail, email, text, or social media message; or otherwise when you visit the Website; purchase products from us; attend events that we organize or participate in; engage our representatives or employees; interact with social media pages or profiles; or buy or inquire about goods or services offered by us (the "Services").

This Privacy Policy does not apply to the practices of entities that we do not own or control, or to people that we do not employ or manage (we refer to them collectively the "Third-Party").

### **Your Consent**

By accessing any part of the Website or using the Services, you consent to and agree with this Privacy Policy. This Privacy Policy is part of the Terms and Conditions of Service governing your use of the Website and the Services. Any dispute over privacy is subject to this Privacy Policy and our Terms and Conditions of Service. If you do not agree with any part of this Privacy Policy, please do not use or access the Website or the Services

### **Personal Information We Collect**

When you visit the Site, we automatically collect certain information about your device, including information about your device characteristics, operating system, web browser, IP address, time zone, language preferences, and some of the cookies that are installed on your device. In addition, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with and navigate on the Site. We refer to this automatically-collected information as "Device Information." We collect Device Information using the following technologies:

- "Cookies" are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
- "Log files" track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- "Web beacons," "tags," and "pixels" are electronic files used to record information about how you browse the Site.

When you make a purchase or attempt to make a purchase through the Site or at a retail shop, we collect certain information from you, including your name, billing address, shipping address, payment information (including credit card numbers), email address, and phone number. We refer to this information as "Order Information."

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When we talk about “Personal Information” in this Privacy Policy, we are talking both about Device Information and Order Information.

Additionally, we may obtain information about you from other sources such as public databases, joint marketing partners, social media platforms, as well as from other third parties. Examples of such information we receive from other sources include: social media profile information (your name, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture, and any other information that you choose to make public); marketing leads and search results and links, including paid listings (such as sponsored links).

## **How Do We Use Your Personal Information?**

We use the Order Information that we collect generally to fulfill any orders placed through the Site (including processing your payment information, arranging for shipping, and providing you with invoices and/or order confirmations). Additionally, we use this Order Information to:

- Communicate with you; Screen our orders for potential risk or fraud; and when in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.
- We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).

## **Sharing Your Personal Information**

Unless described in this Privacy Policy, we do not share, sell, rent, or trade any of your information with third parties for their promotional purposes. For the purpose of improving your customer experience, we may share Personal Information with trusted Third-Party service providers who perform services for us on our behalf and require access to such information to do that work. Examples include: payment processing, email delivery, hosting services, customer service and marketing efforts, and data analysis. We may allow selected Third Party partners to use tracking technology on the Sites, which will enable them to collect data about how you interact with and navigate on the Sites over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity.

We use Google Analytics to help us understand how our customers use the Site – you can read more about how Google uses your Personal Information

here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics

here: <https://tools.google.com/dlpage/gaoptout>.

Finally, if we are legally required to do so, in order to comply with applicable law, governmental requests, a judicial proceeding, court order, legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements); or to otherwise protect our rights; we may disclose your information to aid in necessary action.

## **Behavioral Advertising**

As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative’s (“NAI”) educational page at: <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

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You can opt out of targeted advertising by:

- FACEBOOK & INSTAGRAM - <https://www.facebook.com/settings/?tab=ads>
- GOOGLE - <https://www.google.com/settings/ads/anonymous>
- Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

## **Account Information**

If you would, at any time, like to review or change the information in your account or terminate your account, you can:

- Log into your account settings and update your user account.
- Contact us using the contact information (email) provided.
- Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. Some information may, however, be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Service and/or comply with legal requirements.

## **Email and Newsletter Marketing**

You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list. We will, however, still need to send you service-related emails that are necessary for the administration and use of your account.

## **Do Not Track**

Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser.

## **Security Measures to Protect Your Data**

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. We would, however, like to remind that we cannot guarantee that the internet itself is 100% secure and protected. Although we strive to protect your personal information, the transmission of personal information to and from our Sites is at your own risk. You should only access the services within a secure environment.

## **Your Rights**

If you are a European resident, you have certain rights under applicable data protection laws. These may include the right (i) to request and access personal information we hold about you, (ii) to ask that your personal information be corrected, updated, or deleted, (iii) to restrict or object (in certain circumstances) the processing of your personal information; and (iv), if applicable, to obtain and reuse your own personal data for your own purposes. If you would like to exercise this right, please contact us through the contact information below.

If you are a California Resident, you are granted specific rights regarding access to your personal information. California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about the categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we share personal information in the immediately preceding calendar year. If you are a California Resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

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If you are under 18 years of age, reside in California, and have a registered account with the Sites, you have the right to request removal of unwanted data that you publicly post on the Sites. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Sites, but please be aware that the data may not be completely or comprehensively removed from our systems.

If you reside outside the aforementioned economic areas, we note that we are processing your information in order to fulfill contracts we might have with you (for example if you make an order through the Website), or otherwise to pursue our legitimate business interests listed above. Additionally, please note that your information will be transferred outside of your residence, including the United States.

Under any circumstances, we will not knowingly collect any information from anyone under thirteen (13) years of age. Our Website, products and services are all directed to people who are at least thirteen (13) years old or older. No personally-identifiable information should be submitted to, or posted at, the Website by visitors under thirteen (13) years of age without the prior written consent of their parent or guardian.

## **Data Retention**

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us to keep your personal information for longer than 1 year past the termination of your account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it. In certain circumstances (for example, because your personal information has been stored in backup archives), deletion may not be possible. In such case, we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **Changes To Privacy Policy**

We may update or revise this Privacy Policy from time to time, for any or no reason, at our sole discretion, without notice. Any such change will be effective immediately upon posting. Your continued use of the Website or the Services indicates your acceptance of any such change or revision. For this reason, we encourage you to review this page on a regular basis to ensure that you are familiar with the up-to-date version of this Privacy Policy and the Terms and Conditions of Service. Our use of information is subject to the Privacy Policy in effect at the time that it uses such information.

## **Contact Us**

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by email at [Livia@thinkseneca.com](mailto:Livia@thinkseneca.com).

## **Customer service**

For assistance, please feel free to contact us using our form or at [Livia@thinkseneca.com](mailto:Livia@thinkseneca.com).