



PRIVACY POLICY

Last Updated: March 15, 2022

General

This Privacy Policy describes how Lapine Associates, Inc. and its affiliated entities (collectively, "**Lapine**," "**we**," "**us**," or "**our**") collect, use and share personal data collected from visitors to its websites (our "**Websites**").

By using any of our Websites, you are agreeing to the terms of this Privacy Policy. If you are a California resident, please see our California Consumer Privacy Act Disclosure below.

Certain of Lapine's websites may identify a specific brand partner (each, a "**Brand Partner**"). On a Brand Partner website, Lapine sells products and personalization services related to merchandise carrying the trademarks and logos of such Brand Partner. If you visit or make purchases from a Website Lapine operates on behalf of a Brand Partner, the applicable Brand Partner may receive your information as indicated below. Their receipt of your personal information will be governed by such Brand Partner's privacy policy in addition to this Privacy Policy.

Please note that the privacy policy of other websites affiliated with Lapine may vary from this Privacy Policy. If a website affiliated with Lapine has a separate privacy policy for its website, the provisions of such website's terms and conditions will control in the event of a conflict with this Privacy Policy.

Types of Information We Collect and How We May Share Your Information

When you interact with one of our Websites, we may collect certain information about you. Please see the chart below to understand what information we collect, the sources of that information, how and why we will use that information, and the potential other recipients of that information.

Category of Personal Information Collected	Source of Information	Purpose for Collection	Categories of Recipients
"Identifying Information," such as your name, mailing address, email address, and telephone number.	<p>We may collect Identifying Information from you when you visit and use our Websites and communicate with us (including on one of our social media accounts).</p> <p>We may also receive information about you from third party sources. For example, we may</p>	<p>We use Identifying Information to fulfill your orders for products and services, to answer your communications, to market our products and services to you, to notify you of any issues with your product/purchases and to improve our website and services.</p> <p>We may also use your identifying information as we may be directed by Brand Partner.</p>	<p>We may share Identifying Information with an applicable Brand Partner and third-party service providers who support our business, such as fulfillment services, technical support, delivery services, professional advisors as well as web-hosting providers, analytics providers, customer-relationship management software providers and other</p>

Category of Personal Information Collected	Source of Information	Purpose for Collection	Categories of Recipients
	receive information about you from your employer or from a Brand Partner.		information technology providers.
<p>“Payment and Order Information,” such as your purchase history, shipping and billing addresses, and credit and debit card number.</p>	<p>We may collect Payment and Order Information when you make a purchase on one of our Websites.</p>	<p>We use Payment and Order Information to fulfill your orders for products, to answer your communications and for analytic and marketing purposes to improve our website, products and services. We may also use your identifying information as we may be directed by an applicable Brand Partner.</p>	<p>We may share Payment and Order Information with an applicable Brand Partner and with our third-party service providers (see list above).</p> <p>Please note that payment card information is transmitted via encrypted transmission solely to our payment card processor (currently, Stripe) and is not retained by Lapine.</p>
<p>“Device Information,” related to your interactions with us, such as device information, browser type and operating system, Internet Protocol (IP) address (a unique number that identifies your internet access), cookie information, pages viewed and accessed (including those viewed before and after interacting with our Website), how long you accessed our Website and other technology in any given session, and the date and time of access.</p>	<p>We may collect Device Information automatically when you visit our Websites or otherwise interact with us. See below for more information on cookies and other technologies used by us.</p>	<p>We use Device Information to ensure that our Websites work properly, for analytics and marketing purposes, and to evaluate whether our Websites are secure.</p>	<p>We may share Device Information with Brand Partner and with our third-party service providers (see list above).</p>

Lapine may also receive other, additional categories of personal information that you voluntarily provide when you interact with our Websites and services. For example, if you

- Request quotes, services or support or place an order from one of our Websites;
- Subscribe to our newsletters, programs, promotional emails, white papers or other materials;
- Apply for a job, submit your resume/CV or create a candidate profile;
- Communicate with our customer service representatives; or
- Contact us with your questions/comments.

Please note that we may also use and disclose any information collected through our Websites to: (i) comply with our legal and regulatory responsibilities and to enforce our rights; (ii) authenticate users and to provide for the safety and security of our Websites and otherwise prevent fraud and other prohibited or illegal activities; (iii) protect the security of our Websites, our businesses, and our products and services; (iv) to our affiliated entities and in connection with the sale, assignment or other transfer of our company or our business; or (v) otherwise as disclosed to you at the point of collection.

Except with respect to an applicable Brand Partner, we will not disclose your personal information to third parties for their own marketing purposes without your consent.

Choices Regarding Our Collection and Use of Your Information

We may offer you choices regarding the information we collect and how that information is used and shared. These choices may include the ability to access, update or delete information that you have provided to us or information that we have collected through your use of our Websites. They may also include the ability to opt-out of receiving notifications, promotions, offers or other advertising from us. To inquire about making any of these requests please contact privacy@lapineinc.com.

If you are a resident of California, you have specific rights in relation to your personal information. Please review the section [California Consumer Privacy Act Disclosure](#) below for more information.

How We Secure Your Personal Information

We will take reasonable steps to protect your personal information as you transmit your information from your computer to our Websites and to protect such information from loss, misuse and unauthorized access, disclosure, alteration or destruction. You should keep in mind that no Internet transmission is ever 100% secure or error-free. In particular, email sent to or from our Websites may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

We use a third-party vendor to process credit card transactions. Our online payment sites along with our processing partner reside on secure web servers that encrypt the data between the customer and the processing vendor. By using this service, we do not collect any credit or debit card numbers or store such information.

Links to Other Web Sites

You should be aware that when you are on our Websites you could be directed to other sites beyond our control. For example, if you “click” on a link to the Brand Partner’s official website, the “click” may take you off our Website onto the Brand Partner’s official website. These other websites may send their own cookies to you, independently collect data or solicit personal information and may or may not have their own published privacy policies. If you visit a website that is linked to one of our Websites, you should consult that site’s privacy policy before providing any personal information. Please note that we are not responsible for the privacy practices of third parties.

Collection and Use of Children’s Personal Information

Lapine takes children’s privacy seriously. We sell products intended for purchase by individuals over the age of 16. If you are a child 16 or younger, you are not authorized to make a purchase from our Websites without consent from your parent or legal guardian.

If we become aware that personal information from a child under 13 has been collected without such child’s parent or guardian’s consent, we will use all reasonable efforts to delete such information from our database. If any parent, guardian or other responsible adult becomes aware that we have collected personal information from a child under the age of 13, please contact us at privacy@LapineInc.com.

How We Use Cookies and Other Tracking Technologies

As with many websites, our Websites include a standard technology called a “cookie” and other similar technologies (such as, pixels and web beacons), which are small data files that are transferred to your computer when you use our Websites and services. These technologies automatically identify your browser whenever you interact with our Websites and services.

We use the following types of cookie:

Strictly necessary cookies. These are cookies that are required for the operation of our Websites.

Functionality cookies. These are used to recognize you when you return to our Websites. This enables us to personalize our content for you and remember your preferences.

Analytical/performance cookies. They allow us to recognize and count the number of visitors and to see how visitors move around our Websites when they are using it. This helps us to improve the way our Websites work, for example, by ensuring that users are finding what they are looking for easily. Some of these are third party cookies which analyze website usage.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Domain	Cookie	Description
lapine.dev	__OCSESSID	Session state cookie used when logging into our Websites.
lapine.dev	__currency	Sets the currency to be used on our Websites
lapine.dev	__language	Sets the language to be used on our Websites
google.com; gstatic.com	__ga, __1PJAR	These cookies are assigned by our third-party website analytics provider, Google Analytics. These cookies are used by Lapine and Brand Partner to improve our Websites’ website experience and to track our website performance. For more information please visit Google's website.
checkout.stripe.com & stripe.com	__stripe_mid, __stripe_sid,	These cookies are assigned by our third-party payment processor, Stripe, and assist with the payment process. For more information, please visit the Stripe cookie policy .

onetrust.com		This cookie is placed by OneTrust. It enables OneTrust to manage your cookie preferences.
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Controlling and Deleting Cookies

If you would like to change how a browser uses cookies, including blocking or deleting cookies from our Websites you can do so through the OneTrust tool provided on this site or by changing the settings in your web browser. To control cookies, most browsers allow you to either accept or reject all cookies, only accept certain types of cookies, or prompt you every time a site wishes to save a cookie. It's also easy to delete cookies that are already saved on your device by a browser.

The processes for controlling and deleting cookies vary depending on which browser you use. To find out how to do so with a particular browser, you can use your browser's "Help" function or alternatively, you can visit <http://www.aboutcookies.org> which explains, step-by-step, how to control and delete cookies in most browsers.

Third-Party Ad Serving & Audience and Traffic Measurement Services

Our Websites may use third-party network advertisers to serve advertisements you may see based on your visit. Network advertisers are third parties that display advertisements based on your visits to our Websites and other websites you have visited. Third-party ad serving enables advertisements to be served to you for products or websites you might be interested in. In addition, we may share this information with Brand Partner to allow them and their network advertisers to serve ads based on your interests to you.

Our Websites are in compliance with the Ad Choices Self-Regulatory Program for Online Behavioral Advertising. The goal of Ad Choices is to provide you with information about how online advertising works and the choices you have.

You may visit the <http://www.aboutads.info/choices> page to learn more about online behavioral advertising and to see your opt-out choices from companies that are participants in the Self-Regulatory Program for Online Behavioral Advertising.

Please note that if you choose to opt out, you will still see ads, but these ads will not be customized based on your interests generated from your visits over time and across different websites. In addition, the preferences you select on the <http://www.aboutads.info/choices> page may not apply to mobile devices. Due to the differences between using apps and websites on mobile devices, opt-outs will need to be set for both browsers and apps.

Do-Not-Track

Some browsers have incorporated a Do-Not-Track (DNT) feature. These features, when turned on, send a signal that you prefer that the website you are visiting not collect and use data regarding your online searching and browsing activities. As there is not yet a common understanding on how to interpret the DNT signal, we currently do not respond to DNT signals on our Websites.

Social Media Features

Our Websites may include social media features, including the Facebook "Like" button. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on our

Websites. Your interactions with these features are governed by the privacy policy of the company providing it.

Users Outside the United States

Lapine is located in the United States. Our Websites are directed solely towards users who reside in the United States (and products will only be shipped within the United States). If you choose to use our Websites from outside the United States, you are consenting to the collection, storage, processing, and transfer of your information in and to the United States, pursuant to the laws of the United States.

Changes to This Privacy Statement

We will occasionally update this Privacy Policy. If we make changes to this Privacy Policy or make any material changes to how we use your personal information, we will revise this Privacy Policy to reflect such changes and revise this Privacy Policy's effective date, included at the end of this section. We encourage you to periodically review this Privacy Policy to be informed of how we are using and protecting your personal information.

Other Terms

Your use of our Websites is subject to the Terms of Use that apply to such Website. If you choose to use our Websites, your visit and any dispute over privacy and data collection is subject to this Privacy Policy and the applicable Terms of Use, including limitations on damages, dispute resolution procedures and application of the law of the State of Connecticut.

Contacting Us

If you would like to contact us for any reason regarding our privacy practices, please write to us at the following address:

Lapine Associates Inc.
Attention: Privacy Information
15 Commerce Road
Stamford, CT 06902
USA
privacy@LapineInc.com

California Consumer Privacy Act Disclosure

This California Consumer Privacy Act Disclosure describes how Lapine Associates, Inc. and its affiliated entities (collectively, "Lapine," "we," "us," or "our") collect, use and disclose personal information relating to California residents (consumers) covered by the California Consumer Privacy Act of 2018 ("CCPA").

Introduction

Under the CCPA, "Personal Information" is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident. The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For more information about how we collect, disclose, and secure information relating to these customers, please refer to our general Privacy Policy above. Terms that are used, but not defined, in this CCPA Disclosure are defined in the CCPA.

Collection and Disclosure of Personal Information

In the past 12 months, we have collected, and disclosed to third parties for our business purposes, the following categories of Personal Information relating to California residents covered by this disclosure:

- Identifiers, such as name, postal address, IP address, account credentials and email address;
- Personal information, as defined in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as contact information and financial information;
- Characteristics of protected classifications under California or federal law, such as gender;
- Commercial information, such as transaction information and purchase history;
- Internet or network activity information, such as browsing history and interactions with our website; and
- Geolocation data, such as Internet Protocol (IP) location.

Your information may be “sold” as defined under the CCPA, which defines “sale” as the disclosure of Personal Information to a third-party for monetary or other valuable consideration. California’s definition of sale is broad and encompasses many types of data transfers. However, we do not “sell” any consumer data in the traditional sense for monetary compensation.

The categories of sources from whom we may have collected this Personal Information are:

- Directly from a California resident or the individual’s representatives;
- Service Providers, Consumer Data Resellers and other third parties;
- Public Record Sources (Federal, State or Local Government Sources);
- Information from our Affiliates;
- Website/Mobile App Activity/Social Media; and
- Information from Brand Partner about individuals associated with Brand Partner.

The categories of third parties to whom we may disclose Personal Information for our business purposes described in this privacy disclosure are:

- An applicable Brand Partner.
- Service Providers who support our business, such as fulfillment services, technical support, delivery services, professional advisors as well as web-hosting providers, analytics providers, customer-relationship management software providers and other information technology providers;
- Any court, governmental authority, law enforcement agency or other third party where we believe disclosure is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party or individuals’ personal safety, or to detect, prevent, or otherwise address fraud, security or safety issues;
- To our affiliated entities and in connection with the sale, assignment or other transfer of our company or our business; and.

Use of Personal Information

In the past 12 months, we may have used Personal Information relating to California residents to:

- Deliver the services and support or carry out the transactions for our products that you have requested;

- Send communications to you, such as to respond to your requests and to provide you with product safety information, your transaction status (including order confirmations),
- Provide communications from Brand Partner;
- Customize, analyze and improve our products, services (including the content and advertisements on our website), technologies, communications and relationship with you;
- Comply with our legal and regulatory responsibilities and to enforce our rights.
- Authenticate users and to otherwise provide for the safety and security of our Websites and otherwise prevent fraud and other prohibited or illegal activities;
- Protect the security of our website(s), our business(es), or our products or services; or
- Otherwise, as disclosed to you at the point of collection.

Rights under the CCPA

If you are a California resident, you have the right to:

1. Request we disclose to you free of charge the following information covering the 12 months preceding your request:
 1. the categories of Personal Information about you that we collected;
 2. the categories of sources from which the Personal Information was collected;
 3. the purpose for collecting Personal Information about you;
 4. the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
 5. the specific pieces of Personal Information we collected about you;
2. Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception;
3. Opt-out of our sale of your personal information.
4. Be free from unlawful discrimination for exercising your rights under the CCPA

We will acknowledge receipt of your request and advise you how long we expect it will take to respond if we are able to verify your identity. Requests for specific pieces of Personal Information will require additional information to verify your identity. We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.

If you submit a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

In some instances, we may not be able to honor your request, and we will advise you of that fact in our response. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we will not honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another consumer or where the Personal Information that we maintain about you is not subject to the CCPA's access or deletion rights.

How to Exercise Your Rights

If you are a California resident, you may submit a request by visiting our Do-Not-Sell page [insert link] or by emailing your request to privacy@lapineinc.com.