

FULLBEAUTY Brands Privacy Policy

Last Updated: January 1, 2023

Please click [here](#) for a printable PDF version of this notice.

The FULLBEAUTY Brands family of brands, which includes Woman Within®, Jessica London®, Roaman's®, SwimsuitsForAll®, FullBeauty®, Ellos®, KingSize®, BrylaneHome®, Catherines®, FullBeauty Outlet®, OneStopPlus™, Intimates For All™, Shoes For All™, June + Vie™, Active For All™, Curvewear™ and any other brands owned or operated by FULLBEAUTY Brands, Inc. or any of its affiliates from time to time (collectively, "FULLBEAUTY Brands"), understands that you care about how we collect, use, and share information when you interact with our websites, social media sites and handles, email and online services (our "Services") and we value the trust you place in us. This Privacy Policy explains:

- the [types of information](#) we collect through our Services
- how we [use and protect](#) that information
- the types of information we may [share with others](#) and under what circumstances
- how we [store, secure,](#) and [retain](#) your information
- the [choices you have](#) regarding our collection, use and sharing practices
- details regarding [our use of third party cookies](#) and other tracking technologies

We also include specific disclosures for residents of [California, Virginia, and Nevada](#).

This Policy applies to all of the FULLBEAUTY Brands websites (collectively, the "FULLBEAUTY Brands Websites" or "our websites") on which this Policy appears. It does not apply to non-FULLBEAUTY Brands Websites and mobile applications that may link to the Services or be linked to or from the Services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

Information We Collect

In order to better provide you with our Services, we may collect information as follows:

- Directly from you, when you provide information to us or interact with one of our brands:
 - *Contact information* and any other information you choose to include when you communicate with us via e-mail, mail, phone or other channels. We record telephone conversations and create records of chats with our customer service center for record-keeping, training, and quality assurance purposes.
 - *Profile information*, such as a username and password, your name, mailing address, e-mail address, phone number, and usage and subscription preferences, which may include signing up to some of our Services or communications from us.

- *Transactional information* including goods you purchase, payment information, and shopping history if you make purchases through the Services. For international shipments, we may be required to collect special import identification numbers for customs purposes.
- *Survey information* in response to questions we or our service providers may send you through our Services.
- *Professional or employment-related information* that we receive when you apply for a position with us.
- Automatically from you, when you utilize or interact with our Services:
 - Device information and online user activity when you utilize our technology platforms, as described in the next section.
- From third parties:
 - Information about your interests, contact information, demographic information, and marketing inferences, from third party sources that provide consumer data, social networks and other sources of publicly available data.
 - Information about the marketing and advertisements you have seen or clicked on, from online advertising companies.

Some of this information may be collected by external parties on our behalf. For example, we use a payment processor when you engage in a transaction on our website. We do not collect or store payment card information.

If you provide us with information regarding another individual, you represent that you have that person's consent to give us his or her information and to permit us to use the information in accordance with this policy.

Online User Activity, Cookies and Information Collected by Other Automated Means

When you interact with the Services, certain information about your use of our Services is automatically collected. This includes:

- Usage details of your interactions with our Services, including the timing, frequency and pattern of Service use), the resources that you access, pages viewed, how much time you spent on a page, and how you reached our site.
- Details regarding the device you use to access our Services, including, but not limited to, your IP address, operating system and browser type.

- Location information where you choose to provide our website with access to information about your device's location. We also collect your IP address, which may allow us to determine your location, including to determine your mailing address.
- Information about how you interact with our ads and newsletters, including whether you open or click links in any correspondence.

Much of this information is collected through tags, cookies, web beacons, and other tracking technologies, which may be operated by our partners who assist us in collect information about usage of the Services, serving ads, or providing other services to you. For example, we use Adobe Analytics to collect usage details. You can learn more about privacy and Adobe Analytics [here](#), and opt out of collection of your data by using the [Adobe Analytics Opt-out Browser Add-on](#). We may also use cookies set by other third-party services.

You may be able to opt out of tracking by cookies or control how information collected by cookies is used via a number of means, as described [below](#).

How We Use Your Information

We may use the information we collect from you for the following purposes:

- To provide you with our products and Services, including to take steps to transact a sale or for services, process payments, fulfill orders, and send service communications.
- To enable additional features on our Services and to provide you with a personalized service.
- To notify you regarding products, services, and promotions that may be of interest to you, including sending you text messages and email communications.
- To operate our customer perks and rewards programs, including to enroll you when requested and to provide you with updates regarding your rewards account.
- To create custom audiences on social media sites.
- To provide you with the best service and improve and grow our business, including understanding our customer base and purchasing trends, and understanding the effectiveness of our marketing, and tailoring advertising to you.
- To evaluate, recruit, and hire personnel.
- To detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal, and to comply with legal requirements regarding the provision of products and services.

We may also use or share information in an de-identified manner for many purposes such as research, analysis, modeling, marketing, and advertising, as well as improvement of our Services.

Our Sharing of Your Personal Information

We may share information across our FULLBEAUTY Brands family of brands. We may also share your information as follows:

- *Service Providers:* We may share your information with vendors as needed to perform functions on our behalf such as: website, software and data storage, content management, customer communications, database management, technical integration, marketing automation, analytics, website optimization, conducting customer surveys, shipping, and payment processing.
- *Analytics Partners:* We partner with analytics providers, who collect information via tracking technologies on our websites to assist us with measuring visits and traffic on our websites so we can measure and improve the performance of the sites.
- *Third parties involved in advertising and marketing:* We share information with third parties who assist us in serving advertising regarding the Services, who may also use the information for commercial purposes. These third parties may include data cooperatives, who consolidate information from multiple companies to provide customer targeting services. Our third party partners also include parties who use tracking technologies on our FULLBEAUTY Brands Websites to collect or receive information from the Services and elsewhere on the internet and use that information to provide measurement services and target ads.
- *Similar Companies:* We may share your mailing address directly with other companies who may sell services of interest to you. We limit these companies to using your mailing address once unless you interact with them.
- *Social Media Platforms:* Where you choose to interact with us through social media, your interaction with these programs typically allows the third party to collect some information about you through digital cookies they place on your device and other tracking mechanisms. In some cases, the third party may recognize you through its digital cookies even when you do not interact with their application. Please visit the third parties' respective privacy policies to better understand their data collection practices and controls they make available to you.
- *Branded Private Label Credit Card Accounts:* If you hold a branded private label credit card, we share information with the bank that issues branded private label credit card accounts, Bread Financial (formerly Comenity Bank). Shared information includes the date of the order, the type of payment, the amount of the order, and similar items, and may also include your name, address or other contact information. Bread Financial's Privacy Policy is available [here](#).
- *Change of Ownership or Corporate Organization:* We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an

acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Policy.

- *Other:* We may also disclose information about you: (i) if we are required to do so by law or legal process; (ii) when we believe disclosure is necessary to prevent harm or financial loss; (iii) in connection with an investigation of suspected or actual fraudulent or illegal activity; or (iv) under exigent circumstances to protect the personal safety of our staff, users, or the public.

How We Secure and Store the Information We Collect From or About You

We endeavor to maintain reasonable administrative, technical, and physical safeguards to protect the personal information we collect through the Services against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf and cannot guarantee that this information will not be accessed, disclosed, altered, or destroyed.

If you use our Services outside of the United States, you understand that we may collect, process, and store your personal information in the United States and other countries. The laws in the U.S. regarding personal information may be different from the laws of your state or country. Any such transfers will comply with safeguards as required by relevant law. By using the Services, you consent to the collection, international transfer, storage, and processing of your data.

Retention of Your Information

We will retain your personal information for as long as is necessary to complete the purposes for which it was collected, or as may be required by law.

California law requires us to provide information regarding the criteria we use to determine the length of time for which we retain personal information. We utilize the following criteria to determine the length of time for which we retain information:

- The business purposes for which the information is used, and the length of time for which the information is required to achieve those purposes;
- Whether we are required to retain the information type in order to comply with legal obligations or contractual commitments, to defend against potential legal claims, or as otherwise necessary to investigate theft or other activities potentially in violation of our policies and procedures applicable to you or against the law, to ensure a secure online environment, or to protect health and safety;
- The privacy impact of ongoing retention on the consumer; and
- The manner in which information is maintained and flows through our systems, and how best to manage the lifecycle of information in light of the volume and complexity of the systems in our infrastructure.

Individual pieces of personal information may exist in different systems that are used for different business or legal purposes. A different maximum retention period may apply to each use case of the information. Certain individual pieces of information may also be stored in combination with other individual pieces of information, and the maximum retention period may be determined by the purpose for which that information set is used.

Your Options

- *Account Information:* Please visit the [My Account](#) page to update your contact information and payment method.
- *Email Marketing:* If at any time you would like to unsubscribe from receiving future emails, you can click the unsubscribe link at the bottom of any email bulletin or email us at Unsubscribe@fbbrands.com and we will promptly remove you from all correspondence.
- *Direct Mail Marketing:* If you would like to be removed from a paper catalog mailing list, you can email us by going to the relevant FULLBEAUTY Brands Website and clicking on the email link in the "Contact Us" section on each. Please make sure to provide us with your exact name and address as it appears on the mailing label from your catalog so that we can identify you correctly. We will make every effort to implement any choice you make as soon as possible, but you should allow up to three months for mailing change requests to be fully implemented. Any mailings that you may receive during this time do not reflect your subscription status, and we ask that you please disregard them.
- *Online Activity Tracking and Interest-Based Advertising:* You have several options to either prevent our collection of information regarding your online activity, or prevent third parties from using such information from being used for interest-based advertisements:
 - You can opt out or set preferences regarding cookies when a device you utilize visits the services by clicking the following links for each of our FULLBEAUTY Brands Websites:
 - [Woman Within](#)
 - [Roaman's](#)
 - [FullBeauty](#)
 - [FullBeauty Outlet](#)
 - [Jessica London](#)
 - [Ellos](#)
 - [KingSize](#)
 - [Brylane Home](#)
 - [Catherines](#)
 - [OneStopPlus](#)
 - [Swimsuits For All](#)
 - [Intimates For All](#)

- [Shoes For All](#)
- [June + Vie](#)
- [Active For All](#)
- [Curviewear](#)

Please note that you will need to set preferences on each device you use to visit the Services.

- You can also modify your browser settings to disable or reject cookies across the internet; but if you do so, some features of our website or Services may not function properly or be available. If you are visiting the Services from a mobile device, the operating system of the device may offer you options regarding how the device collects and uses your information for interest-based advertising. Click [here](#) for more information.
- You may be able to prevent third parties from using your information for interest-based advertisements across the internet by visiting <http://www.networkadvertising.org> or <http://www.aboutads.info>. Please note this does not opt you out of being served ads, nor will it prevent the receipt of interest-based advertising from other companies that do not participate in these programs.
- Please note that we do not respond to “Do Not Track” signals sent from browsers.
- *Disclosure to Third Parties for Marketing Purposes:* You may opt-out of disclosure of your information to third parties who offer products and services you may be interested in by submitting a request via [this form](#).
- *SMS Marketing:* Consent to receive automated marketing text messages is not a condition of any purchase. You can opt-out of receiving commercial text messages via by responding to any of our text messages with any of the following replies: STOP, END, CANCEL, UNSUBSCRIBE, or QUIT. If you opt-out, we may still send you messages regarding the status of your orders and other service-related communications.
- *Collection and Disclosure of Information by Consumer Data Providers:* When you opt out of our use or sharing of your information, it does not opt you out of the use or sharing by other companies, including “data brokers” who may provide us with information.

Children’s Information

We do not knowingly collect personal information from children under 16 years old. If you are a parent and believe that your child under the age of 16 has accessed and/or used our website or Services or otherwise provided personal information to us, please contact us at the mailing address at the end of this Privacy Policy, and we will work to delete that account and any such personal information.

Changes to This Policy

We may make changes to this Policy from time to time. We will post any changes, and such changes will become effective when they are posted. Your continued use of our Services following the posting of any changes will mean you accept those changes.

Contacting Us

For questions about our privacy practices, contact us at:

FULLBEAUTY Brands, Inc.
One New York Plaza
New York, NY 10004
Attn: General Counsel
Email: PrivacyOfficer@fbbrands.com

Additional Information for California Residents

Your California Privacy Rights

California's "Shine the Light" law permits customers in California to request certain details about how certain types of their information are shared with third parties for those third parties' own direct marketing purposes. If you are a California resident and would like to make such a request, please email PrivacyOfficer@fbbrands.com or write to us at FULLBEAUTY Brands, Inc., One New York Plaza, New York, NY 10004, Attn: General Counsel.

California Notice at Collection

California law provides California residents with rights to receive certain disclosures regarding the collection, use, and sharing of "Personal Information," rights to access, delete, correct certain Personal Information we collect about them, restrict us from "selling" or "sharing" certain Personal Information, and limit our use of Sensitive Personal Information, as defined by the law and described in the categories below. These rights apply to all residents of CA, regardless of whether you are a customer or business contact. As a California resident, you have a right not to receive discriminatory treatment for the exercise of your privacy rights.

[Click here](#) to learn more about your rights.

Collection, Use, and Retention of Personal Information

You have the right under the California Consumer Privacy Act ("CCPA") to receive notice of the categories of Personal Information we collect, the purposes for which those categories of Personal Information will be used, and the criteria we use to determine the length of time for which we will retain the Personal Information.

The following chart describes our practices with regard to the collection, use, and retention of your personal information. The categories we use to describe the information are those listed in the CCPA. Certain personal information may fall into multiple categories, and in some circumstances, how we use and how long we keep the information within each category will vary.

Category	Required Information
Personal Identifiers	<p><u>Examples of what we collect:</u> Name; email address; phone number; and contact address; username; social media handle and basic account information; unique identifiers (such as those assigned in cookies).</p> <p><u>Sources:</u> Directly from you; Third parties.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Certain personal details are maintained throughout the customer relationship in order to provide the Services. When you are no longer a customer, we may still need this information for a period of time for business and legal requirements, such as to calculate taxes and protect against fraud.</p>
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	<p><u>Examples of what we collect:</u> Address; telephone number; tokenized payment card information through processors.</p> <p><u>Sources:</u> Directly from you; Third Parties.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Certain personal details are maintained throughout the customer relationship in order to provide the Services. When you are no longer a customer, we may still need this information for a period of time for business and legal requirements, such as to calculate taxes and protect against fraud.</p>
Protected classification characteristics under California or federal law	<p><u>Examples of what we collect:</u> Gender; inferred race and ethnic origin for marketing purposes.</p> <p><u>Sources:</u> Directly from you; Third Parties.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> Demographic information is used to inform the delivery of our Services throughout the customer relationship, including relevant advertising.</p>
Commercial information	<p><u>Examples of what we collect:</u> Transaction information; billing records; payment records; order history; information about your interactions with us.</p> <p><u>Sources:</u> Directly from you.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p> <p><u>Retention Considerations:</u> The law requires us to maintain purchase records for a period of time, which varies by state.</p>
Biometric information	Not collected.
Internet or other similar network activity	<p><u>Examples of what we collect:</u> Unique numerical identifier; tag, cookie, web beacon or tracking pixel information; device ID; browsing history; search history; IP address; interaction with a website; or interaction with advertisement.</p> <p><u>Sources:</u> Automatically from you; Third Parties.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information.</p>

	<u>Retention Considerations:</u> Internet or other similar network activity is typically deleted at regular intervals when the information is no longer necessary for the purpose for which it was collected.
Geolocation data	We collect coarse information (e.g., IP address as noted above but do not collect precise geolocation).
Professional or employment related information	Not collected.
Education information	Not collected.
Audio, electronic, visual, thermal, olfactory, or similar information	<u>Examples of what we collect:</u> Call recordings (e.g., customer service calls). <u>Sources:</u> Directly from you. <u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information. <u>Retention Considerations:</u> Call recordings are deleted at regular intervals when the information is no longer necessary for the purposes for which it is collected.
Inferences drawn from other personal information	<u>Examples of what we collect:</u> Interests; preferences; inferred race and ethnic origin for marketing purposes. <u>Sources:</u> Third Parties; created about you based on information you provide and information we receive from Third Parties. <u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information. <u>Retention Considerations:</u> The retention period for this type of personal information will vary depending on the nature of the underlying information from which the inference is created.
Sensitive information	<u>Examples of what we collect:</u> Password or credentials allowing access to an account, inferred racial or ethnic origin for marketing purposes. <u>Sources:</u> Directly from you; Third Parties. <u>Purpose of collection and use:</u> All purposes listed in How We Use Your Information. <u>Retention Considerations:</u> Certain personal details about you are maintained throughout the life of the customer relationship in order to provide the Services.

If your browser offers you the ability to use the [Global Privacy Control](#) (GPC) to communicate your privacy preferences to us, we honor such signals for residents of California.

Sale, Sharing, and Other Disclosure of Personal Information

California law also requires us to provide you with information regarding the parties to whom we “sell” or “share” your information, and the parties to who we disclose your information for a business purpose. Under the CCPA, a business “sells” personal information when it discloses personal information to a company for monetary or other benefit. A company may be considered a third party either because the purpose for its sharing of personal information is not for an

enumerated business purpose under California law, or because its contract does not restrict it from using personal information for other purposes.

We sell or share your information as follows:

- Identifiers: similar companies; analytics partners; advertising and marketing partners.
- Personal information categories listed in the California Customer Records statute: similar companies; analytics partners; advertising and marketing partners.
- Internet or Electronic Network Activity Information: analytics partners; advertising and marketing partners.
- Sensitive Personal Information: to analytics partners; advertising and marketing partners.

Any category of personal information listed above may be disclosed for a business purpose to service providers and contractors, which are companies or individuals that we engage to conduct activities on our behalf. Service providers and contractors are restricted from using personal information for any purpose not related to our engagement.

We may disclose personal information to companies that also provide products and services to our customers for their own marketing purposes and in additional, more limited circumstances, as described above (see “Our Sharing of Your Personal Information” section above).

Right to Opt out of Sale and Sharing

You have the right to opt out of the sale or sharing of your personal information by FULLBEAUTY Brands to third parties. To exercise your right to opt out of the sale or sharing of your information visit, our Your Privacy Choices page.

Please note that your right to opt out does not apply to our sharing of personal information with service providers, as described above.

Right to Limit Use of Sensitive Personal Information

You have the right to request that we limit use of your sensitive personal information to certain purposes allowed by law. For more information on the scope of this right, and to submit a request, click [here](#) for our Notice of Right to Limit Use of Your Sensitive Personal Information.

Right to Request Access to, Correction, and Deletion of Personal Information

You have the right to request access to personal information collected about you and information regarding the source of that information, the purposes for which we collect it, and the third parties and service providers with whom we share it. You also have the right to request we

correct inaccurate personal information and to request, in certain circumstances, that we delete any personal information that we have collected directly from you.

You may submit a request to exercise your rights to know/access, correct or delete your Personal Information by filling out a Consumer Data Request Form available [here](#), or by calling us at 1-800-781-9168. You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf through these means.

In order to process your request to know/access, correct or delete Personal Information we collect, disclose, or sell, we will ask to verify your request. We do this by asking you to provide personal identifiers we can match against information we may have collected from you previously and confirm your request using the email account stated in the request.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

Right to Information Regarding Participation in Data Sharing for Financial Incentives

From time to time we may offer incentives or discounts for consumer to sign up for our email marketing lists. Participation in these incentives is voluntary, and you may opt out of receiving the emails at any time by clicking the “unsubscribe” link in one of the emails.

FULLBEAUTY Brands does not generally assign monetary or other value to consumers’ Personal Information, and our promotional activity changes continually. To the extent California law requires that a value be assigned to such programs, or the price or service differences they involve, FULLBEAUTY Brands values the Personal Information as being equal to the value of the discounts or other financial incentives provided in each such program. Such calculation is based upon a practical and good-faith effort to assess, on an aggregate basis for all collected information: (1) the data elements collected (e.g., email address), (2) the use of such information by FULLBEAUTY Brands in connection with its marketing activities, (3) the range of discounts provided (which can depend on each consumer’s purchases under such offers), (4) the number of consumers enrolled in respective programs, and (5) the product or service to which the benefits (such as price difference) applies. These values can change over time.

Additional Information for Virginia Residents

Virginia law provides Virginia residents with rights to access, delete, and correct certain “Personal Data” we collect about them, as well as to restrict the use of that Personal Data for targeted advertising, restrict the “sale” of that Personal Data, and control our use of Personal Data considered sensitive. If you are a Virginia resident, you also have a right not to receive discriminatory treatment for the exercise of your privacy rights.

You or your authorized agent may submit a request to exercise your access, deletion, and correction rights by filling out a Consumer Data Request Form available [here](#), or by calling us at 1-800-781-9168. To opt out of targeted advertising and the sale or sharing of Personal Data, or to

set preferences regarding our use of sensitive Personal Data, please visit our [Your Privacy Choices](#) page. If we deny your request, you have the right to appeal our decision. You may do so by emailing us at PrivacyOfficer@fbbrands.com.

Additional Information For Nevada Residents

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to third parties who will sell or license their information to others. If you are a Nevada resident and would like to make such a request, please email PrivacyOfficer@fbbrands.com.