

LOOP Privacy Policy

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This “Privacy Policy” describes the privacy practices of LOOP Global Holdings LLC (together with our affiliates, “**LOOP**”, “**Company**” “**we**”, or “**us**”). LOOP offers a full service distribution solution, including proprietary online services, the website located at: loopstore.com (the “**Site**”), software and applications (collectively, the “**LOOP Platform**”), that facilitates the sale, purchase, and delivery of consumer product goods (“**Goods**”) that are packaged in durable and refillable packaging and the return and processing of the durable and refillable packaging, once used, for re-use with additional purchases of the same Goods, which includes the tracking required to ensure the quality assurance of such cleaned and refilled packaging (together with the LOOP Platform, the “**Services**”). This Privacy Policy describes how we collect, use, disclose and otherwise process personal information in connection with our Services, and explains the rights and choices available to individuals with respect to their information. This Privacy Policy governs any of the Services on which the Privacy Policy is posted.

Individuals located in the European Union should be sure to read the important information provided in 14. Additional Information for European Union Users.

Personal Information We Collect

Changes to your personal information

How We Use Your Personal Information

How We Share your Personal Information

Your Choices

Security

Children

Sensitive Personal Data

International Transfer

Other Sites and Services

User Generated Content

Changes to this Privacy Policy

Questions?

Additional Information for European Union Users

1. Personal Information We Collect

Information you give us

Personal information that you may provide through the Services or otherwise communicate with us includes:

- **Account information**, we collect information from you when you register for an account (“**Account**”) on the Site, such as your first name, last name, shipping address, billing address, email address, and telephone.
- **Profile information**, such as your password;
- **Feedback and correspondence**, such as information you provide in your responses to surveys, when you participate in market research activities, sweepstakes, contest or giveaway, report a problem with the Services, receive customer support or otherwise correspond with us;
- **Transaction information**, such as details regarding your subscriptions, such as the Goods you select, your shipments and shipping and billing details;
- **Usage information**, such as information about how you use the Services and interact with us;
- **Marketing information**, such your preferences for receiving marketing communications and details about how you engage with them;

Information we get from others. We may also get information about you from other sources, for example from Google, if you are signed into Google, we may get demographic data (e.g. gender, age), if you are not signed in, we may receive geographical and technical data (e.g. browser type, location) and we may add this to information we get from the Services.

We may combine other publicly available information, such as information related to the organization for which you work, with the personal information that you provide to us through our Services.

Information automatically collected

We may automatically log information about you and your computer or mobile device when you access our Site. For example, we may log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the website you visited before browsing to our Sites, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Sites. We collect this information about you using cookies. Please refer to the Cookies and Similar Technologies section for more details.

2. Changes to your personal information

It is important that the personal information we hold about you is accurate and current. Please let us know if your personal information changes during your relationship with us by updating your Account or contact our customer support indicated below.

Cookies and Similar Technologies

What are cookies?

We may collect information using “cookies” or similar technologies (altogether, “Cookies”). Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our Site.

We use two broad categories of Cookies: (1) first party Cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Site; and (2) third party Cookies, which are served by service providers on our Site, and can be used by such service providers to recognise your computer or mobile device when it visits other websites.

Cookies we use

Our Site uses the following types of Cookies for the purposes set out below:

Type of cookie	Purpose
<i>Local Storage</i>	This technology allows our Site to remember choices you make when you use our Site. The purpose of this is to provide you with a more personal experience and to avoid you having to re-select your preferences every time you visit our Site.
<i>Analytics and Performance Cookies</i>	<p>These cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered may include the number of visitors to our Site, the websites that referred them to our Site, the pages they visited on our Site, what time of day they visited our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site more efficiently, to gather broad demographic information, monitor the level of activity on our Site, and improve the Site.</p> <p>We use Google Analytics for this purpose. Google Analytics uses its own cookies. You can find out more information about Google Analytics cookies here and about how Google protects your data here. You can prevent the use of Google Analytics relating to your use of our Site by downloading and installing the browser plugin available here.</p>

Disabling Cookies

You can typically remove or reject Cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings,” “help” “tools” or “edit” facility). Many browsers are set to accept Cookies until you change your settings.

Further information about Cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org.

If you do not accept our Cookies, you may experience some inconvenience in your use of our Site. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Site.

Pixel tags

We may also use pixel tags (which are also known as web beacons and clear GIFs) on our Site to track the actions of users on our Site. Unlike Cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages. Pixel tags measure the success of our marketing campaigns and compile statistics about usage of the Site, so that we can manage our content more effectively.

Do Not Track Signals

Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not currently respond to do not track signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

3. How We Use Your Personal Information

To provide our Services

If you have an Account or use our Services, we use your personal information to:

- operate, maintain, administer and improve the Services;
- manage and communicate with you regarding your Account, if you have one, including by sending you service announcements, technical notices, updates, security alerts, and support and administrative messages;
- process and manage subscriptions you purchase via the Services, including to track and administer your shipments;
- better understand your needs and interests, and personalize your experience with the Services;
- provide support and maintenance for the Services; and
- respond to your service-related requests, questions and feedback.

To communicate with you

If you request information from us, register for an Account, or participate in our surveys, promotions or events, we may send you Company-related marketing communications as permitted by law. You will have the ability to opt out of such communications as described below.

For research and development

We use information automatically collected and other information to analyze trends, administer the Services, analyze users' movements around the Site, gather demographic information about our user base as a whole, improve the Services and develop new products and services.

To provide you with advertising

We may use your personal information to serve ads on the Services or on third party sites and to tailor ads to your interests and browsing history. Please refer to the Cookies and Similar Technologies section for more details.

To comply with law

We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities.

With your consent

We will request your consent to use your personal information where required by law, such as where we use certain cookies or similar technologies or would like to send you certain marketing messages. If we request your consent to use your personal information, you

have the right to withdraw your consent any time in the manner indicated when we requested the consent or by contacting us at support@loopstore.com or +1 (609) 656-5150.

To create anonymous data

We may create anonymous data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous data by excluding information that makes the data personally identifiable to you, and use that anonymous data for our lawful business purposes.

For compliance, fraud prevention and safety

We use your personal information as we believe necessary or appropriate to (a) enforce the terms and conditions that govern the Service; (b) protect our rights, privacy, safety or property, and/or that of you or others; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

4. How We Share your Personal Information

Affiliates

We may disclose your personal information to our subsidiaries and corporate affiliates for purposes consistent with this Privacy Policy.

Service Providers

We may employ third party companies and individuals to administer and provide the Services on our behalf (such as customer support, hosting and storage, analytics, email delivery, marketing/advertising and database management services). These third parties may use your information only as directed by Company and in a manner consistent with this Privacy Policy, and are prohibited from using or disclosing your information for any other purpose.

Third Party Payment Processing

For online payments, we use the payment services of Authorize.net (<https://www.authorize.net/>). We only process, record and maintain the last four (4) digits and the expiration date of your credit card so we can display it for you and may remind you before it expires. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. For more information on how payments are handled, or to understand the data security and privacy afforded such information, please refer to <https://www.authorize.net/about-us/privacy/>.

Professional advisors

We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

Compliance with Laws and Law Enforcement; Protection and Safety

Company may disclose information about you to government or law enforcement officials or private parties as required by law, and disclose and use such information as we believe necessary or appropriate to (a) comply with applicable laws and lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; (b) enforce the terms and conditions that govern the Service; (c) protect our rights, privacy, safety or property, and/or that of you or others; and (d) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

Business Transfers

Company may sell, transfer or otherwise share some or all of its business or assets, including your personal information, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets or in the event of bankruptcy, in which case we will make reasonable efforts to require the recipient to honor this Privacy Policy.

The Services may enable you to post content to SNSs. If you choose to do this, we will provide information to such SNSs in accordance with your elections. You acknowledge and agree that you are solely responsible for your use of those websites and that it is your responsibility to review the terms of use and privacy policy of the applicable website or service. We will not be responsible or liable for: (i) the availability or accuracy of such website or service; (ii) the content, products or services on or availability of such website or service; or (iii) your use of any such website or service.

Third parties partners/organizations

In addition to the sharing described above, we may share your information with third parties partners/organizations. .

If you register on the Davos microsite (www.loopstore.com), we will ask your consent to share personal data such as your name and personal address with LOOP partners for consumer insights, in compliance with the applicable data protection laws and regulations.

Such sharing may link to third-party websites and services that are outside our control. We are not responsible for the security or privacy of any information collected by these third parties, which operate pursuant to their respective privacy policies.

5. Your Choices

Access, update, correct or delete your information

All Company Account holders may review, update, correct or delete the personal information in their Account by logging into their Account. Company Account holders may also contact us at support@loopstore.com or +1 (609) 656-5150 to accomplish the foregoing or if you have additional requests or questions.

Marketing communications

You may opt out of marketing-related emails by logging in and changing your account settings, by clicking on a link at the bottom of each such email, or by contacting us at support@loopstore.com or +1 (609) 656-5150. You may continue to receive service-related and other non-marketing emails.

Testimonials

If you gave us consent to post ratings/comments or a testimonial on our Sites, but wish to update or delete it, please contact us at support@loopstore.com or +1 (609) 656-5150.

Choosing not to share your personal information

Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Services to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with the Services and may need to close your account. We will tell you what information you must provide to receive the Services by designating it as required in the Services or through other appropriate means.

Other Important Privacy Information

6. Security

The security of your personal information important to us. We take a number of organizational, technical and physical measures designed to protect the personal information we collect, both during transmission and once we receive it. However, no security safeguards are 100% secure and we cannot guarantee the security of your information. We will comply with applicable laws and regulations requiring that we notify you in the event your personal information is compromised as a result of a breach of our security measures.

7. Children

Our Services not directed to children under 16. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at support@loopstore.com or +1 (609) 656-5150. If we learn that we have collected personal information from a child under age 16, will delete such information from our files as soon as reasonably practicable.

8. Sensitive personal data

We ask that you not send us, and you not disclose, any sensitive personal data (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Site or otherwise to us.

If you send or disclose any sensitive personal data to us when you use the Site, you must consent to our processing and use of such sensitive personal data in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal data, you must not submit such sensitive personal data to our Site.

9. International transfer

Company is headquartered in the United States and has affiliates and service providers in other countries, and your personal information may be transferred to the United States or other locations outside of your state, province, country or other governmental jurisdiction where privacy laws may not be as protective as those in your jurisdiction.

European Union users should read the important information provided below in Additional Information for European Union Users about transfer of personal information outside of the European Economic Area.

10. Third party sites and services

The Services may contain links to other websites and services. These links are not an endorsement, authorization or representation that we are affiliated with that third party. We do not exercise control over third party websites or services, and are not responsible for their actions. Other websites and services follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies of the other websites you visit and services you use.

11. User generated content

We may make available on our Sites, or link to, features that allow you to share information online (e.g., on message boards, in chat areas, in file uploads, through events, etc.). Please be aware that whenever you voluntarily disclose personal information online, that information becomes public and can be collected and used by others. We have no control over, and take no responsibility for, the use, storage or dissemination of such publicly-disclosed personal information. By posting personal information online in public forums, you may receive unsolicited messages from other parties.

12. Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. We encourage you to periodically review this page for the latest information on our privacy practices. If we make changes to this Privacy Policy we will post them on the Site and update the Last Updated date above. If we make material changes to this Privacy Policy you will be notified via e-mail (if you have an Account where we have your contact information) or another manner through the Services that we believe reasonably likely to reach you. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

Any modifications to this Privacy Policy will be effective upon our posting of the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

California Privacy Rights

We may share your personal information with third parties (and in some cases, affiliates) for their direct marketing purposes. Under California Civil Code sections 1798.83- 1798.84, California residents are entitled to request certain information regarding such disclosures within the immediately preceding calendar year. To make such a request, email us at support@loopstore.com. You must put the statement “Your California Privacy Rights” in the subject field of your e-mail or include it in your writing if you choose to write to us at the designated mailing address. You must include your name, street address, city, state, and ZIP code. We are not responsible for notices that are not labelled or sent properly, or do not have complete information. **BECAUSE WE DO NOT CONTROL THE PRIVACY PRACTICES OF THESE THIRD PARTY COMPANIES, YOU SHOULD READ AND UNDERSTAND THEIR PRIVACY POLICIES.**

NOTICE TO CALIFORNIA RESIDENTS – YOUR CALIFORNIA PRIVACY RIGHTS

(AS PROVIDED BY CALIFORNIA CIVIL CODE SECTION 1798.83)

A CALIFORNIA RESIDENT WHO HAS PROVIDED PERSONAL DATA TO A BUSINESS WITH WHOM HE/SHE HAS ESTABLISHED A BUSINESS RELATIONSHIP FOR PERSONAL, FAMILY, OR HOUSEHOLD PURPOSES (A “CALIFORNIA CUSTOMER”) MAY REQUEST INFORMATION ABOUT WHETHER THE BUSINESS HAS DISCLOSED PERSONAL INFORMATION TO ANY THIRD PARTIES FOR THE THIRD PARTIES’ DIRECT MARKETING PURPOSES. IN GENERAL, IF THE BUSINESS HAS MADE SUCH A DISCLOSURE OF PERSONAL DATA, UPON RECEIPT OF A REQUEST BY A CALIFORNIA CUSTOMER, THE BUSINESS IS REQUIRED TO PROVIDE A LIST OF ALL THIRD PARTIES TO WHOM PERSONAL DATA WAS DISCLOSED IN THE PRECEDING CALENDAR YEAR, AS WELL AS A LIST OF THE CATEGORIES OF PERSONAL DATA THAT WERE DISCLOSED. CALIFORNIA CUSTOMERS MAY REQUEST FURTHER INFORMATION ABOUT OUR COMPLIANCE WITH THIS LAW BY E-MAILING support@loopstore.com. PLEASE NOTE THAT WE ARE REQUIRED TO RESPOND TO ONE REQUEST PER CALIFORNIA CUSTOMER EACH YEAR AND WE ARE NOT REQUIRED TO RESPOND TO REQUESTS MADE BY MEANS OTHER THAN THROUGH THIS E-MAIL ADDRESS.

13. Contact Us

If you have any questions or concerns at all about our Privacy Policy, please feel free to contact us at support@loopstore.com or +1 (609) 656-5150., or write to us at:

LOOP GLOBAL HOLDINGS LLC
121 New York Avenue
Trenton, New Jersey 08638 USA

14. Additional Information for European Union Users

Personal information

References to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation.

Controller and Data Protection Officer

Company is the controller of your personal information for purposes of European data protection legislation. See the 13. Contact Us section above for contact details.

Legal bases for processing

We only use your personal information as permitted by law. We are required to inform you of the legal bases of our processing of your personal information, which are described in the table below. If you have questions about the legal basis of how we process your personal information, contact us at support@loopstore.com or +1 (609) 656-5150.

Processing purpose (click link for details)	Legal basis
To provide the Services	Processing is necessary to perform the contract governing our provision of the Services or to take steps that you request prior to signing up for the Services.
To communicate with you To provide you with advertising To create anonymous data For compliance, fraud prevention and safety	These processing activities constitute our legitimate interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
To comply with law	Processing is necessary to comply with our legal obligations
With your consent	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it anytime in the manner indicated in the Service or by contacting us at support@loopstore.com or +1 (609) 656-5150.

Use for new purposes

We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

Marketing communications

By default, you should not receive marketing communications. If we want to send you marketing communication, you will need to first provide an expressed interest in “opting in” to communications. When you are filling out a contact or other form, if you click “Sign me up for the newsletter” when you sign up, you are opting in to marketing communications emails. You can later opt in or out by editing your account information.

Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Information) for legal or regulatory requirements, this can include but is not limited to tax and audit purposes.

In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) in which case we may use this information indefinitely without further notice to you.

Your rights

European data protection laws give you certain rights regarding your personal information. You may ask us to take the following actions in relation to your personal information that we hold:

- **Inform. Know about the collection and use of personal information.**
- **Opt-out.** Stop sending you direct marketing communications. You may continue to receive service-related and other non-marketing emails.
- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information.

You can submit these requests by email to support@loopstore.com or our postal address provided in 13. **Contact Us.** We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or response to your requests regarding your personal information, you may contact us as described 13. **Contact Us** or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

Cross-Border Data Transfer

Whenever we transfer your personal information out of the EEA to countries not deemed by the European Commission to provide an adequate level of personal information protection, the transfer will be based on one of the following safeguards recognized by the European Commission as providing adequate protection for personal information, where required by EU data protection legislation:

- the country to which we send the personal information may be approved by the European Commission or;

- the recipient may have signed a specific contract approved by the European Commission as providing adequate protection of personal information. For further details, see the European Commission's [website](#) for model contracts for the transfer of personal information to third countries, or;
- for transfers to third parties in the United States, ensuring they participate in the EU-US Privacy Shield Framework

Please contact us at support@loopstore.com or +1 (609) 656-5150 if you want further information on the specific mechanism used by us when transferring your personal information out of the EEA.