



Privacy Policy

Last updated: March 1, 2018

Privacy Policy

This Privacy Policy (this “Policy”) describes how personal information is collected from users of the [Snaprends website](#) at (the “Site”) and the Snaprends Service (“Service”), operated by Snap Trends, Inc. (“Snap Trends,” “we,” or “us”) and how that information is used and disclosed. The Service is provided through the Site but may link to or connect with other third party websites (“Third Party Sites”). We encourage you to read this Policy carefully before providing any personal information on the Site or Service. The use of information collected through our service shall be limited to the purpose of providing the service for which the Client has engaged Snap Trends.

Snap Trends participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. Snap Trends is committed to subjecting all personal data received from European Union (EU) member countries, in reliance on the Privacy Shield Framework, to the Framework’s applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce’s Privacy Shield List. [<https://www.privacyshield.gov/list>]

Snap Trends, Inc. complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. Snap Trends, Inc. has certified that it adheres to the Privacy Shield Principles. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield Principles, the Privacy Shield certification page, please visit <https://www.privacyshield.gov/>

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Snap Trends is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

Information We Collect

We collect “personal information” about users of the Site and the Service in the normal course of our business. As used in this Policy, “personal information” is information that identifies or is capable of being associated with an identifiable person. Some examples of personal information include a user’s



name, email address, and phone number. Personal information does not include aggregate information or de-identified information. “Aggregate information” is information about the use of the Site, such as information collected about Site users, or a category of services or users, from which any personal information has been removed. An example of aggregate information would be a report stating that forty-seven percent of the Site’s registered users identify themselves as male.

Most of the personal information we receive comes directly from users who register on the Site, use the Service or who otherwise voluntarily provide information to us in connection with various activities on the Site or Service. The information we request at registration includes, without limitation, name, e-mail address, and phone number. We may also collect other types of information during registration or in connection with your other activities on the Site, such as company information and information about or contained in postings you make in forums or any other interactive areas of the Site, your answers to surveys, your participation in sweepstakes, contests, games and promotional offers; and in any email request you send us for any reason (such as to request customer service or provide us with comments or feedback).

If you participate in contests or surveys, we will request certain personal information from you. Participation in these surveys or contests is completely voluntary and you therefore have a choice whether or not to disclose this information. The requested information typically includes contact information (such as name and shipping address), and demographic information (such as zip code).

We also automatically collect some information when you use the Site or Service. We gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data.

We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, to improve marketing, analytics, and site functionality.



If you reached the Site by clicking on a link or advertisement on another site, we also log that information. This helps us understand our users' interests and maximize our online exposure. We also maintain server logs that provide us with general information about visitors and customers, which assist us in administering our Site and providing the Service. In some cases we collect non-personally identifiable information on our visitors and customers in the aggregate so that performance data can be tracked, logged and reported back for analysis of how such visitors and customers are generally using our Site and Service and their various features.

Third Party Sites

The Service may be linked to or connected with Third Party Sites. We may collect personal information or content located on or provided by Third Party Sites. When you submit personal information to us in this manner, it is treated as personal information under this Policy. The collection and use of personal information by the Third Party Site directly (i.e., outside of the Service) is governed separately by the privacy policy of such site. We encourage you to review the privacy statements of such Third Party Sites to understand their privacy practices.

Cookies, Web Beacons and Similar Technologies

Technologies such as: cookies, beacons, tags and scripts are used by Snap Trends and our marketing partners [e.g. Google, Yahoo], affiliates, or analytics or service providers. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We use cookies to identify Site and Service users and to customize their experiences on the Site and Service. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

We use Local Storage, such as HTML5, to store content information and preferences. Third parties with whom we partner to provide certain features on our website or to display advertising based upon your web browsing activity also use Flash cookies to collect and store information. Various browsers may offer their own management tools for removing HTML5. To manage Flash cookies, please click here:

http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html



How We Use the Information We Collect

We use the information we collect to:

- Create your account
- contact you for administrative purposes or provide you with customer service;
- check financial qualifications and to collect and enforce payment;
- complete transactions requested by you;
- operate and improve the Site and to provide personalized information or services to you;
- respond to any questions, problems or complaints, or request feedback;
- organize the Site and Service to better serve you and customize or develop our products and services;
- market the Site and Service;
- send you emails pertaining to our verification process, our policies, and content that you submit;
- enforce our policies and procedures and to protect our rights and intellectual property or the rights of others using the Site or Service;
- and investigate and help prevent potentially unlawful activity or activity that threatens the network.

Personal information provided on our Site or through the Service may be linked together or merged with other personal information we obtain about you so that we may better understand your needs and inform you about our products or services and those of our business partners.

We may share data about customers with our contracted service providers so they can provide services on our behalf or to ensure the quality of information provided. We only share your personal information to third parties only in the ways described in this Privacy Policy. We never share, sell, rent, or trade any information with third parties for their promotional purposes.

From time to time, we may partner with other companies to jointly offer products or services. If you purchase or specifically express interest in a jointly-offered product or service, we may share data collected in connection with such purchase or expression of interest with our partner(s). We do not control our business partners' use of data, and their use of such information will be in accordance with their respective privacy statements. If you do not wish for your information to be shared in this manner, you may opt to not purchase nor specifically express interest in a jointly offered product or service or you may contact us info@snaprends.com.



We use a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use billing information except for the sole purpose of credit card processing on our behalf.

Disclosure of Information

We do not rent, sell or disclose personal information to third parties without your prior consent, except as described in this Policy. We may share personal information when we have your consent to do so, when required by law, when required to protect our rights or property, as necessary to complete a transaction you have requested, or for marketing purposes. We reserve the right to use and disclose any non-personal information that we collect. We may use third party service providers to assist us with the administration of the Site or Service or to perform other services for us, including transaction processing and sending email. These third parties may be given or may have access to your personal information, but agree to receive and use such information solely to provide services to us or on our behalf.

If you provide us with personal information through a Third Party Site, we may share such information with such Third Party Site for their internal business purposes and we generally require such Third Party Sites to comply with this Policy. In addition, we may also share personal information with third parties for such third parties' (or other third parties') marketing purposes; however, we provide you with the choice of opting-out of such disclosures (please see "Choice and Access" below).

We partner with a third party to either display advertising on our Web site or to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out if located in the European Union, [click here](#). Please note this does not opt you out of being served ads. You will continue to receive generic ads.

Information about our users, the Site and the Service is a business asset of Snap Trends. Therefore, information about our users, including personal information, will be disclosed as part of any (a) merger or acquisition, (b) creation of a separate business to provide the Site or our Service, or to provide other services or fulfill products; (c) debt financing, sale or pledge of company assets, or (d) insolvency, bankruptcy or receivership in which personal information would be transferred as one of Snap Trends' business assets. You will be notified via email and/or a prominent notice on our Web site of any change



in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

In certain situations, Snap Trends may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We may release personal information when we believe release is appropriate to comply with the law (e.g., a lawful subpoena, warrant or court order); to enforce or apply our policies or any other agreement with a user; to initiate, render, bill, and collect for amounts owed to us; to protect our rights or property; to protect our users from fraudulent, abusive, or unlawful use of our Site or its services; to enforce contest, sweepstakes, promotions, or game rules; or if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure of communications or justifies disclosure of records without delay.

To facilitate our global operations, we may transfer and access data about Snap Trends customers from around the world. This Policy shall apply even if we transfer data to other countries.

We may share data about Snap Trends customers with other members, channel partners, resellers and affiliates of the snaptrends.com corporate group in order to work with them. For example, we may need to share such data for customer relationship management purposes.

Snap Trends is responsible for the processing of personal data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. Snap Trends complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Privacy Shield, Snap Trends is potentially liable.



Choice and Access

We provide our users with the ability to “opt-in” to receiving certain communications from us or having their information disclosed to third parties by indicating their preferences at the time of registration. If such user later wishes to change these preferences or access, change or delete their personal information we provide the following options:

To “opt-out” of receiving promotional e-mail from us, you can; (a) send an email to info@snaptrends.com with your request; or (b) click on the “unsubscribe” link in the email you receive from us.

To “opt-out” of receiving promotional mailings from us, you can: (a) send an email to info@snaptrends.com with your request; or (b) write to us at Snap Trends, Inc., 11801 Domain Blvd 3rd FL Austin, TX 78758.

To “opt-out” of disclosure to third parties for their direct marketing purposes, you can: (a) send an email to info@snaptrends.com with your request; or (b) write to us at Snap Trends, Inc., 11801 Domain Blvd 3rd FL Austin, TX 78758.

Upon request Snap Trends will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information you can (a) send an email to info@snaptrends.com with your request; or (b) write to us at Snap Trends, Inc., 11801 Domain Blvd 3rd FL Austin, TX 78758.

To request to access, correct, update or delete your personal information, you can: a) send an email to info@snaptrends.com with your request; or (b) write to us at Snap Trends, Inc., 11801 Domain Blvd 3rd FL Austin, TX 78758. We will respond to your request to access within 30 days.

Please note that opting out of receiving communications from us will not prevent you from receiving administrative communications.

Data Retention

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.



Customer Content

Snap Trends customers may electronically submit data or information to the Services for hosting and processing purposes and in connection with their use of the Services (“Customer Content”). We will not review, share, access, distribute or reference any such Customer Content except in a manner consistent with your agreement with us to use the Services, or as may be required by law. Customer Content does not include Social Media Content.

Social Media Widgets

Our Web site includes Social Media Features, such as the Facebook button and Widgets, such as interactive mini-programs that run on our site. 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 and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

Children

We do not intend, and the Site is not designed, to collect personal information from children under the age of 13. If you are under 13 years old, you should not register with or otherwise provide personal information to our Site or the Service.

Security

We use reasonable security measures in an effort to prevent loss, misuse and alteration of information under our control. When you enter sensitive information (such as login credentials) on our forms, we encrypt the transmission of that information using secure socket layer technology (SSL). We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. We cannot, however, guarantee protection of all information against interception, misappropriation, misuse, or alteration, or that your information may be not be disclosed or accessed by accidental circumstances or by the unauthorized acts of others. Furthermore, we have no control over the security of other sites you might visit, interact with or do business with.

Information Collected on behalf of our Clients

Snap Trends collects information under the direction of its Clients, and has no direct relationship with the individuals whose personal data it processes. If you are a customer of one of our Clients and would no longer like to be contacted by one of our Clients that use our service, please contact the Client that you interact with directly. We may transfer personal information to companies that help us provide



our service. Transfers to subsequent third parties are covered by the service agreements with our Clients.

An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct his query to the Snap Trends 's Client (the data controller). If the Client requests Snap Trends to access or remove the data, we will respond to their request within 30 days.

We will retain personal data we process on behalf of our Clients for as long as needed to provide services to our Client. Snap Trends will retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Complaints

In compliance with the Privacy Shield Principles, Snap Trends commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact Snap Trends at:

info@snaptrends.com

Snap Trends has further committed to refer unresolved privacy complaints under the privacy shield principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of our complaint, or if your complaint is not satisfactorily addressed. Please visit www.bbb.org/eu-privacy-shield/for-eu-consumers for more information and to file a complaint.

Under certain conditions, more fully described on the Privacy Shield website <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may invoke binding arbitration when other dispute resolutions procedures have been exhausted.



Policy Changes

We will modify this Policy if our privacy practices materially change in the future. Prior to the change becoming effective, we will notify you of such changes by means of a prominent notice on the site as well as posting the new policy on our Site and indicating at the top of the Policy the date it was last updated. We encourage you to review the Policy each time you visit our Site or Service to see if it has been updated since your last visit to make sure you understand how personal information you provide will be used.

Questions / Additional Information

If you have any questions about this Policy, or the practices of or your dealings with the Site or Service, please contact us at the following address or email us at info@Snaptrends.com.

Snap Trends, Inc.
11801 Domain Blvd
3rd Floor
Austin, Texas 78758

