

WOW's Privacy Policy

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I. Introduction

Cloud 9 Photography, a sole proprietorship [hereinafter “we”, “us” or “our”] operates the website www.wowthwonderofwomen.com [WOW] (hereinafter the “Website”) and is the controller of the information collected or provided via this Website.

We are passionately committed to protecting the privacy of our customers.

This Privacy Policy ("Privacy Policy") explains how we collect, use and disclose information from and about you when you use the Website services.

Please read this privacy policy carefully, as your access to and use of our Website signifies that you have read, understand, and accept all terms within this privacy policy.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, if the changes are significant, we will provide you with additional notice (such as adding a statement to our homepage or sending you an email notification).

We encourage you to review the Privacy Policy whenever you access the Website to stay informed about our information practices and the choices available to you.

If you have any questions about our privacy practices, please contact us.

II. Scope

This privacy policy applies to information we collect: A) on this Website and your email communications with this Website; B) through our mobile applications that provide dedicated non-browser-based interaction between you and this Website, or C) when you interact with our advertising and applications on third-party websites and services, if any, if those applications or advertising include links to this privacy policy.

III. Collection of Information You Provide to Us

We may collect different kinds of personal data about you, as stated below.

Website activity data: We collect information about how you use our Website, products and services and interact with our content and advertisements [if any], including the pages you visit on our Website, search history, and the referring web page from which you arrived at our Website. We collect browser and operating system information, devices you use to access the Website and your time zone setting. We also collect online identifiers. Specifically, we collect internet protocol (IP) address information and we set cookies as explained below in the section on Cookies and Automatic Data Collection Technologies.

We may use your data to produce and share aggregated insights that do not directly or indirectly identify you and are not associated with you. Such aggregate information is not personal information. We collect information you provide directly to us. For example, we collect information when you:

Log Information: We log information about your use of the Services, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our Services.

Device Information: We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, screen resolution, color and depth, device identifiers and mobile network information.

The types of information we may collect include your name, email address, postal address, phone number, fax number, credit card information, bank transfer information, Social Security number (and other data necessary for tax reporting relating to payments to users), title, gender, and other information you choose to provide.

IV. Regarding Minors

Our Website is not directed to persons under the age of 18 or the applicable age of majority in the jurisdiction from which the Website is accessed (“minors”), and we prohibit minors from using this Website.

We do not knowingly collect personal information from minors. If you are the parent or legal guardian of a minor who has provided us with personal information, please contact us at pmancus@comcast.net to have that minor’s personal information deleted.

V. Information Collected by Cookies and Other Tracking Technologies

We use various technologies to collect information, including cookies, web beacons and similar technologies.

Cookies are small data files stored on your hard drive or in device memory that help us to provide and improve our Services and your experience, see which areas and features of our Services are popular and count visits, and for our advertising and analytics purposes. We use cookies to keep you logged in to the Services, to count the number of unique computers using the Services and to record your user preferences.

We may also collect information using web beacons (also known as "tracking pixels").

Web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon. You may be able to set your web browser to refuse certain types of cookies, or to alert you when certain types of cookies are being sent. Some browsers offer similar settings for HTML5 local storage, and Flash storage can be managed here.

VI. Information We Collect From Other Sources

We may also obtain information from other sources and combine that with information we collect through our Website. For example, if you create or log into your account through a social media site, we will have access to certain information from that site, such as your name, account information and friends lists, in accordance with the authorization procedures determined by such social media site.

We may receive updated information about you, such as an updated billing address, from the financial institution issuing your credit card in connection with our billing for the Services.

When somebody buys a gift for you on our service, we'll receive your shipping information from the purchaser.

Users also can share another person's email address with us.

VII. Use of Information

Our use of the following information, which we call "Customer Personal Data," is limited.

We use such information for the following purposes:

To analyze, personalize and improve our Services;

To provide the products and Services you order;

To respond to questions, concerns, or customer service inquiries;

To facilitate contests, sweepstakes and surveys, if any;

To enforce the legal terms that govern our business and commercial relationships;

To comply with law and legal process and protect rights, safety and property; and

For other purposes requested or permitted by our users or other relevant individuals, such as website visitors.

We also may use personal information to create appropriately aggregated or anonymized data, which is not subject to this Privacy Policy, and which we may use or disclose for any purpose.

VIII.

Sharing of Information

We may share information about you as follows or as otherwise described in this Privacy Policy:

A. With vendors, consultants and other service providers who need access to such information to carry out work on our behalf; If you purchase prints or other products from one of our subscribers so that such subscriber may, for example, provide you with assistance or answer questions you may have in connection with your purchases;

B. In response to a request for information if we believe disclosure is in accordance with any applicable law, regulation or legal process, or as otherwise required by any applicable law, rule or regulation;

C. If we believe your actions are inconsistent with the spirit or language of our user agreements or policies, or to protect the rights, property and safety of our Website or others;

D. In connection with, or in anticipation of, any merger, divestiture, consolidation, bankruptcy, sale of company assets, financing or acquisition of all or a portion of our business to another company, or other significant corporate event (in which case the acquiring entity may use the information pursuant to its own privacy policies and procedures, to the extent legally permissible);

E. With your consent or at your direction, including if we notify you through our Services that the information you provide will be shared in a particular manner and you provide such information.

F. We may also share aggregated or anonymized information that does not directly identify you; and

G. Our sharing of Photographer Personal Data with a WOW Affiliated Photographer is governed by our agreement with them. If you contact us regarding a request or complaint about a WOW Affiliated Photographer, we may forward your communication to the user who posted it.

IX.

Advertising and Analytics Services Provided by Others

We may allow others to serve advertisements on our behalf across the Internet and to provide analytics services. These entities may use cookies, web beacons, mobile device identifiers, and other technologies to collect information about your use of the Services and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other websites and better understand your online activity.

For more information about interest-based-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit www.aboutads.info/choices.

We use Google Analytics to understand our website traffic.

We may allow additional services later.

You can opt out of Google Analytics by installing Google Analytics' opt-out browser add-on.

X.

Legal Basis for Collecting and Processing Information

The laws in some jurisdictions require companies to tell you about the legal grounds that allow them to use or disclose your personal data. Where those laws apply, our legal grounds are:

A. Legitimate interests: We often handle personal data because it furthers the legitimate interests of our Website (or of our customers, affiliates, business partners, or suppliers) in business activities such as the ones listed below, and because that handling of data does not unduly impact your interests, rights, and freedoms:

- Facilitating free speech, artistic expression, and journalism;
- Providing customer service;
- Some of our marketing and advertising activities;
- Analyzing and improving business activities;
- Protecting business activities, individuals, and property (for example, protecting against abuse of our Services); and
- Managing risks and legal issues.

B. To honor our contractual commitments to the individual: Some of our handling of personal data is necessary to meet our contractual obligations to individuals, or to take steps at the person's request because we are planning to enter into a contract with them.

For example, when we process an individual's personal payment data for a subscription, we are relying on this basis.

C. Consent:

- If the law requires consent, and in some other cases, we handle personal data on the basis of consent. For example, we conduct some of our direct marketing on the basis of consent.
- If the law allows, we may be able to infer consent from the circumstances.

D. Legal compliance: We sometimes need to use and disclose personal data to comply with our legal obligations.

E. Legal claims: Sometimes we use or disclose personal data because it is necessary to establish, exercise, or defend legal claims.

XI. Security

We take physical, technical and administrative measures to help protect information about you from loss, theft, misuse and

unauthorized access, disclosure, alteration and destruction. However, no security measure is perfect. We cannot and do not promise that any information will remain secure.

XII. Data Retention

We store the information we collect about you for as long as is necessary for the purpose(s) outlined in this Privacy Policy, unless the law requires us to keep it for a longer period of time. Information in copies made for backup and business continuity may remain for longer than the original data.

XIII. Data Transfers

To provide the Services, we may transfer your information to servers operated by our service providers in the United States or other countries.

When we transfer information from the European Economic Area (“EEA”) or UK to countries that the European Commission has not deemed to provide an adequate level of protection, we normally do so on the basis of either (i) Standard Contractual Clauses approved by the European Commission for such purpose or (ii) the recipient’s participation in the EU-U.S. Privacy Shield Framework (described below).

We comply with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal data we receive in the U.S. from the European Economic Area, and Switzerland. This commitment extends to the personal information received in the U.S. from the UK, regardless of the status of Brexit. In compliance with the Privacy Shield Principles, we are committed to resolving complaints about our processing of your personal data. Covered individuals in Europe with inquiries or complaints regarding our compliance with the Privacy Shield program should first contact

us. We have further committed to refer unresolved Privacy Shield complaints to JAMS, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your Privacy Shield complaint from us, or if we have not addressed your complaint to your satisfaction, please contact us.

Under certain conditions, you may be able to invoke binding arbitration to resolve your complaint.

We are subject to the investigatory and enforcement powers of the Federal Trade Commission.

If we share personal data transferred to the U.S. under the Privacy Shield with an agent that processes such data on our behalf, then we will have certain responsibility under the Privacy Shield Principles if both (i) the agent Processes the information in a manner inconsistent with the Privacy Shield Principles and (ii) we are responsible for the event giving rise to the damage.

XIV. Your Choices

- 1. For privacy-related takedown requests, or to exercise any rights you may have under privacy law regarding images on the Website, please contact us.**
- 2. For cookies, please see the “Advertising and Analytics Services Provided by Others” section above for options for controlling cookies and similar technology.**
- 3. As to promotional communications, you may opt out of receiving promotional communications from us by telling us you are not interested.**
- 4. The law of your jurisdiction may give you additional rights to make certain requests with respect to your personal data. This is the case, for example, for residents of the European Economic Area and Switzerland, and, as described further below, residents of California. Our preference is to treat requests from all users in a similar way, regardless of where they live, to the extent we find**

this practicable and legally feasible. So although we describe the rights that exist under certain specific laws and frameworks below, we are happy to receive such requests from users in different jurisdictions as well.

XV. Western Europe

People who live in the UK or elsewhere in the European Economic Area (and certain other people) have additional rights to opt out of our use of personal data for direct marketing. They can exercise their rights to opt out, or to object to other processing, by contacting us as described below.

Every individual has the right to lodge a complaint with the data privacy authority where they reside.

Individuals and data protection supervisory authorities in the EU and the UK may contact us for our assistance and cooperation.

XVI. Additional Privacy Details for California Residents

The sections below apply to “personal information” about California residents, as that term is defined in the California Consumer Privacy Act (CCPA), and they supplement the information in the rest of our Privacy Policy above.

CCPA categories of California personal information we collect:

In the main part of our Privacy Policy, we describe the specific pieces of personal information we collect from and about California residents. This information generally falls into the following CCPA categories, to the extent that any of the following are personally identifiable: identifiers (such as name, address, email address and other contact information); commercial information (such as transaction data, and information about an individual’s interactions with us); categories of personal information described in California

Civil Code 1798.80(e) (such as name); characteristics of protected classifications under California or federal law (such as gender); internet or other network or device activity, and other information described in the Information Collected by Cookies and Other Tracking Technologies section of our Privacy Policy; geolocation information; professional or employment related data (such as title); and other information that identifies or can be reasonably associated with you. CCPA description of uses of California personal information: In CCPA terms, we have used and disclosed (and in the past 12 months have used and disclosed) all of the categories of California personal information that we collect for the purposes described in the Use of Information section of our Privacy Policy, though some uses and disclosures were more indirect than others. The extent to which our service providers engage in the uses and disclosures described above varies from provider to provider.

CCPA “sale” of California personal information

We do not “sell” and have not “sold” anyone’s personal information in the way most people understood those words before the CCPA was passed.

We don’t sell copies of our user lists like a data broker would, for example.

We do not accept money for letting unrelated third parties target advertisements to our users. However, the CCPA defines “sell” and “sold” in an unconventional, vague and controversial way that has sparked extensive debate and disagreement within the legal and business communities. The CCPA requires businesses that “sell” personal information, as the term “sell” is defined under the CCPA, to provide an opt-out from such “sales.” Some people have taken the position that when a website or app uses third-party cookies and similar technology for its own analytics or advertising purposes, the website/app is engaged in a “sale” under the CCPA if the third parties have some ability to use, disclose or retain the data to improve their service or to take steps beyond the most narrowly drawn bounds of merely providing their service to the website/app. Some take this

position even when the website/app pays the third party (not vice versa), and in most cases merely provides the third party with an opportunity to collect data directly, instead of sending a copy of personal information to the third party.

If you take the position that any of those relationships involve a “sale” within the meaning of the CCPA, then you may consider we have “sold” what the CCPA calls “identifiers” (like IP addresses), “internet or other electronic network activity information” (like information regarding an individual’s browsing interactions on the Website), and “commercial information” (like the fact that a browser visited a page directed to people who are considering purchasing from us) to those sorts of companies.

As we await clarity on this point and, if applicable, the arrival of a reasonable method for handling CCPA-like choice options for it, we continue to offer individuals the opportunity to opt out of the use of certain third-party cookies and similar technology for analytics and advertising purposes, as described in the Advertising and Analytics Services Provided by Others section of our Privacy Policy.

California Privacy Rights

This section describes rights under California law, but we plan to accept requests under this law from non-Californians, to the extent practicable and legally permissible.

California law may permit you to request that we:

A. Provide you with a list of the categories of personal information we have collected or disclosed about you in the last twelve months; the categories of sources of such information; the business or commercial purpose for collecting or selling your personal information; and the categories of third parties with whom we disclosed and (if applicable) “sold” personal information in the CCPA sense.

B. Provide access to and/or a copy of certain information we hold about you.

C. Delete certain information we have about you. [However, certain information is exempt from such requests under applicable law.]

D. You also may have the right to receive information about the financial incentives that we offer to you (if any).

E. You also have certain rights under the CCPA not to be subject to certain negative consequences for exercising CCPA rights.

Exercising Your CCPA Rights

To exercise any of your CCPA rights please consult with a legal advisor of your choice and contact us.

XVII. Contact Us

We welcome your feedback.

If you have any comments or concerns about this Privacy Policy or would like to contact us for any reason, you may reach us via email at pmancus@comcast.net.