Website privacy notice

1. Introduction

- 1.1 We are committed to safeguarding the privacy of childrenwithhairloss.us visitors and service users.
- 1.2 This notice applies where we are acting as a data controller with respect to the personal data of https://childrenwithhairloss.us visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 In this notice, "we", "us" and "our" refer to Children With Hair Loss.

2. How we use your personal data

- 2.1 In this Section 2 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
 - (c) the purposes for which we may process personal data; and
 - (d) the legal bases of the processing.
- 2.2 We may process data about your use of our website and services. ("usage

data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data may be used for our analytics tracking. This usage data may be processed for the purposes of analyzing the use of the website and services. The legal basis for this processing is consent OR our legitimate interests, namely monitoring and improving our website.

- 2.3 We may process your account data ("account data"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.4 We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.5 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The source of the service data is you or your employer. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.6 We may process information that you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.7 We may process [information contained in any enquiry you submit to us regarding goods and/or services] ("**enquiry data**"). The enquiry data may be processed [for the purposes of offering, marketing and selling relevant goods and/or services to you]. The legal basis for this processing is [consent] OR [[specify basis]].

- 2.8 We may process information relating to our customer relationships, including customer contact information ("**customer relationship data**"). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is consent OR our legitimate interests, namely the proper management of our customer relationships.
- 2.9 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website] ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.
- 2.10 We may process information that you provide to us for the purpose of i subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 2.11 We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

- 2.12 We may process any of your personal data identified in this noticewhere necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.13 We may process any of your personal data identified in this notice where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our organization against risks.
- 2.14 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 2.15 Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. Providing your personal data to others

- 3.1 We may only disclose your personal data to any member of our organization insofar as reasonably necessary for the purposes, and on the legal bases, set out in this notice.
- 3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.3 We may disclose *personal data such as name and shipping address* to our shipping suppliers including UPS and the United States Postal Service insofar as reasonably necessary for ecommerce orders.
- 3.4 Financial transactions relating to our website and services are OR may be handled by our payment services providers, *including PayPal, Square and Stripe*. 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. You can find information about the payment services providers' privacy policies and practices at *the websites of these 3rd party payment processors*.

3.5 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4. International transfers of your personal data

- 4.1 In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the United States
- 4.2 We do not have offices outside the United States.
- 4.3 The hosting facilities for our website may be situated in the United States
- 4.4 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

5. Retaining and deleting personal data

- 5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3 We will retain your personal data as follows:

 Personal data will be retained for no set minimum or maximum period

- 5.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained.
- 5.5 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

- 6.1 We may update this notice from time to time by publishing a new version on our website.
- 6.2 You should check this page occasionally to ensure you are happy with any changes to this notice.
- 6.3 We may notify you of changes to this notice by email

7. Your rights

- 7.1 In this Section 7, we have summarized the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 7.2 Your principal rights under data protection law are:
 - (a) the right to access;
 - (b) the right to rectification;
 - (c) the right to erasure;

- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.
- 7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data.
- 7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed]. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims.
- 7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defense of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of

any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.

- 7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 7.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
- (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

- 7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the state of your habitual residence, your place of work or the place of the alleged infringement.
- 7.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 7.13 You may exercise any of your rights in relation to your personal data by written notice to us, in addition to the other methods specified in this Section 7.

8. About cookies

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

- 8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9. Cookies that we use

- 9.1 We use cookies for the following purposes:
 - (a) authentication we use cookies to identify you when you visit our website and as you navigate our website
 - (b) status we use cookies to help us to determine if you are logged into our website
 - (c) personalization we use cookies to store information about your preferences and to personalize the website for you
 - (d) security we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally
 - (e) advertising we use cookies to help us to display advertisements that will be relevant to you. We do not have 3rd party on advertisements on our site. We may suggest relevant content, services and products within our own site, however.
 - (f) analysis we use cookies to help us to z the use and performance of our website and services
 - (g) cookie consent we use cookies to store your preferences in relation to the use of cookies more generally.

10. Cookies used by our service providers

- 10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 10.2 We may use Google Analytics to analyze the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at:

11. Managing cookies

- 11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
 - (a) https://support.google.com/chrome/answer/95647 (Chrome);
 - (b) https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences (Firefox);
 - (c) https://www.opera.com/help/tutorials/security/cookies/ (Opera);
 - (d) https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies (Internet Explorer);
 - (e) https://support.apple.com/kb/PH21411 (Safari); and
 - (f) https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy (Edge).

- 11.2 Blocking all cookies will have a negative impact upon the usability of many websites.
- 11.3 If you block cookies, you will not be able to use all the features on our website.

12. Our details

- 12.1 This website is owned and operated by Children With Hair Loss.
- 12.2 We are a registered 501(c)3 non-profit organization. | EIN 38-3537982 |

CFC 41571 | MICS#29820

- 12.3 Our principal place of business is at 12776 Dixie Hwy, South Rockwood, MI 48179
- 12.4 You can contact us:
 - (a) by mail, to 12776 Dixie Hwy, South Rockwood, MI 48179
 - (b) by using our website contact form
 - (c) by telephone, at (734) 379-4400
 - (d) by email, at childrenwithhairloss@hotmail.com

PLEASE SEE NEXT PAGE FOR CCPA PRIVACY POLICY RIDER

CCPA Privacy Notice

Last Updated: January 23, 2020

Children With Hair Loss is complying with the CCPA and considering its underlying principles in how we think about customer trust and data privacy as a core pillar of our business. We are providing this CCPA-specific privacy notice to supplement the information and disclosures already contained in our Privacy Policy. This notice applies to individuals residing in California from whom we collect Personal Information.

The TLDR for California residents is:

1798.80(e)

We do not sell your Personal Information.

The chart below outlines the categories of Personal Information (which are defined by the CCPA, not us) that we have collected and/or disclosed for a business purpose in the preceding twelve months. The examples of Personal Information provided for each category are taken from the CCPA and are included to help you understand what the categories mean. The examples are not meant to indicate what we actually collect or disclose, and more information about our specific practices can be found in our Privacy Policy.

Category	We Collect	We Disclose	We Sell
A. Identifiers	Yes	Yes	No
Examples: Name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.			
B. Categories of Personal Information in Cal. Civ. Code	Yes	Yes	No

Examples: Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.

C. Characteristics of Protected Classifications under California or Federal Law

Examples: Race or color, ancestry or national origin, religion or creed, age (over 40), mental or physical disability, sex (including gender and pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, gender identity or expression, medical condition, genetic information, marital status, military and veteran status.

D. Commercial Information

Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

E. Biometric Information

No

No

N/A

N/A

No

N/A N/A

Yes Yes

Examples: Physiological, biological, or behavioral characteristics, including DNA, that can be used, singly or in combination with each other or with other identifying data, to establish individual identity, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.

F. Internet or Other Electronic Network Activity Information	Yes	Yes	No
Examples: Browsing history, search history, and information regarding a consumer's interaction with an internet website, application or advertisement.			
G. Geolocation Data	No	N/A	N/A
Example: Precise physical location.			
H. Sensory Information	No	N/A	N/A
Examples: Audio, electronic, visual, thermal, olfactory, or similar information.			
I. Professional or employment-related information	Yes	Yes	No

Examples: Job application or resume information, past and current job history, and job performance information.

J. Non-Public Education Information (as defined in 20 U.S.C. 1232g; 34 C.F.R. Part 99)

Examples: Records that are directly related to a student maintained by an educational agency or institution or by a party acting for the agency or institution.

K. Inferences Drawn from Personal Information

Examples: Consumer profiles reflecting a consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Use of Personal Information

The CCPA defines various business and commercial purposes for collecting, using, and disclosing Personal Information. While we collect, use, and disclose Personal Information pursuant to our Privacy Policy as a whole, we wanted to clarify that this includes Personal Information in accordance with the specific CCPA business and commercial purposes below:

- 1. Auditing related to a current interaction with you and concurrent transactions, including, but not limited to auditing compliance with this specification and other standards.
- 2. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- 3. Debugging to identify and repair errors that impair existing intended functionality.
- 4. Short-term, transient use.
- 5. Contracting with service providers to perform services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing

N/A

No

Yes

N/A

Yes

No

- advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
- 6. Undertaking internal research for technological development and demonstration.
- 7. Undertaking activities to verify or maintain the quality or safety of our services, and to improve, upgrade, or enhance our services.
- 8. Otherwise enabling or effecting, directly or indirectly, a commercial transaction.
- 9. For other purposes for which we provide specific notice at the time the information is collected.

Collection and Disclosure of Personal Information

In the preceding twelve months since this notice was last updated, we have collected Personal Information from general sources including you, your use of our services, your devices, our affiliates, our vendors, and our service providers. More specific information about the Personal Information we collect is laid out in this notice and in our Privacy Policy, which we update from time to time.

As also explained in our Privacy Policy, we share your Personal Information with the following categories of CCPA third parties:

- 1. Affiliates.
- 2. Vendors and service providers, including for data analytics and marketing and advertising our products and services to you.
- 3. Third parties integrated into our services.
- 4. Third parties as required by law and similar disclosures.
- 5. Third parties in connection with a merger, sale, or asset transfer.
- 6. Other third parties for whom we have obtained your permission to disclose your Personal Information.

Your California Privacy Rights

If you are a California resident, you may exercise the following rights.

Right to Know and Access. You may submit a verifiable request for information regarding the: (1) categories of Personal Information collected or disclosed by us; (2) purposes for which categories of Personal Information are collected by us; (3) categories of sources from which we collect Personal Information; and (4) specific pieces of Personal Information we have collected about you during the past twelve months.

Right to Delete. Subject to certain exceptions, you have the option to delete Personal Information about you that we have collected from you.

Verification. Requests for access to or deletion of Personal Information are subject to our ability to reasonably verify your identity in light of the information requested and pursuant to relevant CCPA requirements, limitations, and regulations.

Right to Equal Service and Price. You have the right not to receive discriminatory treatment for the exercise of your CCPA privacy rights, subject to certain limitations.

Shine the Light. We do not rent, sell, or share your Personal Information with nonaffiliated companies for their direct marketing purposes, unless we have your permission.

Submit Requests. To exercise your rights under the CCPA, you can deactivate and purge your account in your control panel settings.

Contact Information

If you have any questions, comments, or concerns about our processing activities, or you would like to exercise your privacy rights, please email us at childrenwithhairloss@hotmail.com or write to us at:

Children With Hair Loss

12776 Dixie Hwy, South Rockwood, MI 48179