

ITG Brands, LLC California Privacy Notice

Effective January 1, 2020

A new privacy law that provides California consumers certain rights regarding their personal information became effective on January 1, 2020. However, as of that date the California Attorney General had not completed the rule making process to establish the regulations for businesses to implement the law. Accordingly, ITG Brands, LLC (“Company,” “we,” or “our”) is delaying our full implementation of the law until we have definitive guidance from final regulations, and it will take some time following the date the regulations are final to implement them. In the meantime, we are providing you with notice of the personal information we collect and our purposes for that collection. In addition, if you are a California consumer and would like to register a request under your “right to know about personal information collected, disclosed or sold” (including right to obtain copies of specific pieces and/or information about categories of personal information practices), “right to request deletion of personal information” or “right to opt-out of the sale of personal information,” you can contact us at Privacy@itgbrands.com and we will respond to your request as and when we have guidance on how to properly verify you and respond to your requests and are able to do so; however, be advised that these rights do not apply to personal information collected from (a) job applicants, current and former employees and independent contractors (“HR Data Subjects”), or (b) representatives of another business in connection with business communications or transactions (“B-to-B Data Subjects”). HR Data Subjects who are also California residents may learn more about our data collection practices by contacting their human resources department.

We collect personal information (PI) from California consumers (but excluding B-to-B Data Subjects, who are not entitled to this notice) for the following purposes:

Category of PI	Examples	Purposes
1. Identifiers	This may include but is not limited to: name, postal address, Internet Protocol (IP) address, email address	This may include but is not limited to: managing interactions and transactions, performing services and operations and providing benefits, processing interactions, data security.
2. Personal Records	This may include but is not limited to: name, postal address, telephone number	This may include but is not limited to: managing interactions and transactions, performing services and operations and providing benefits, processing interactions, data security.

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3. Personal Characteristics and Traits	This may include but is not limited to: age	This may include but is not limited to: managing interactions and transactions
4. Commercial Information	This may include but is not limited to: products or services purchased, obtained or considered, or other purchasing or consuming histories or tendencies	This may include but is not limited to: managing interactions and transactions, performing services and operations and providing benefits, processing interactions, data security.
5. Biometric Information	N/A	N/A
6. Internet Usage Information	This may include but is not limited to: browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement	This may include but is not limited to: managing interactions and transactions, performing services and operations and providing benefits, processing interactions, data security.
7. Geolocation Data	This may include but is not limited to: physical location	This may include but is not limited to: managing interactions and transactions, processing interactions
8. Sensory Data	N/A	N/A
9. Professional or Employment Information	N/A	N/A
10. Non-public Education Records	N/A	N/A
11. Inferences from PI Collected	This may include but is not limited to: inferences regarding a consumer's preferences, characteristics, psychological trends, predispositions, behavior, and attitudes	This may include but is not limited to: managing interactions and transactions, data security

Please note that consistent with a lack of consensus on the issue, we do not consider cookies on our sites to constitute a sale by us of your personal information, but we will be watching for regulatory and industry guidance on the issue.

Company provides California residents with the option to opt-in to sharing of “personal information” as defined by California Civil Code Section 1798.83 (“Shine the Light law”) with third parties, other than Company Affiliates, for such third parties’ own direct marketing purposes. We do not share personal information with non-Affiliate third parties for their direct marketing purposes absent your consent. If you are a California resident, you may request information about our compliance with the Shine the Light law and/or withdraw previously given consent to sharing with non-Affiliate third parties for their direct marketing purposes by contacting us by e-mail at Privacy@itgbrands.com or by sending a letter to 714 Green Valley Road, Greensboro, NC 27408-7018 (Attn: Legal Department). Any such request must include “California Privacy Rights Request” in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one information request per customer each year, but you can withdraw a previously given consent at any time. We are not required to respond to requests made by means other than through this e-mail address or mail address.

Although users are required to be twenty-one (21) years of age or older to use the Service, as required by California law, if any California residents under the age of eighteen (18) have improperly registered to use the Service, and posted content or information on the Service, they can request removal by contacting us by e-mail at Privacy@itgbrands.com, detailing where the content or information is posted and attesting that they posted it. Company will then make reasonable good faith efforts to remove the post from prospective public view or anonymize it so the minor cannot be individually identified to the extent required by applicable law and to terminate the unauthorized account. This removal process cannot ensure complete or comprehensive removal. For instance, third parties may have republished or archived content by search engines and others that Company does not control.

We will revise this California Privacy Notice from time-to-time as the law becomes more clear and we are able to provide you with better information on your CCPA rights and how to exercise them.