PRIVACY POLICY

This Privacy Policy was updated on October 1, 2019.

Your privacy is important to <u>the companies of SVP Worldwide</u> so we've developed a Privacy Policy that covers how we collect, use, disclose, transfer, and store your personal information.

Please take a moment to familiarize yourself with our privacy practices and contact us if you have any questions.

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Contacting Us

If you have general questions about your account or our products and services, please visit http://www.svpworldwide.com/contact for assistance.

If you have any questions or concerns specifically about SVP Worldwide's Privacy Policy or data processing, or if you would like to make a complaint about a possible breach of local privacy laws, please contact us. When contacting us, please include your name and country of residence.

You may also address your communications by mail to SVP Worldwide, Attn: Data Protection Office, 1714 Heil Quaker Boulevard, Suite 130, La Vergne, TN 37086.

The data controller of your Personal Information is **Singer Sourcing Limited**, **LLC**.

Collection and Use of Personal Information

You may choose to submit Personal Information (such as your name, address, e-mail address and telephone number) to us at several different points on our websites, through our apps, and at our stores.

We collect, use, and disclose Personal Information for business purposes only. At times, we will ask your permission to process your Personal Information, like when you sign up for a newsletter or create an account. Other times, when you'd reasonably expect us to process your personal information, we don't ask your permission, but only when (1) we are legally allowed to do so and (2) our use fits with the <u>rights</u> you have.

SVP Worldwide and its affiliates may share this Personal Information with each other and use it consistent with this Privacy Policy. We may also combine it with other information to provide and improve our products, services, content, and advertising.

You are not required to provide the Personal Information that we have requested, but, if you choose not to do so, in many cases we will not be able to provide you with our products or services or respond to any queries you may have.

When we collect Personal Information, we will notify you and give you information explaining how your information will be used.

Here are some examples of the types of Personal Information SVP Worldwide may collect and how we may use it:

Information you provide to us:

We collect Personal Information like your:

- Name:
- Email address:
- Address or postal code;
- Payment methods;
- Hobbies, interests, and preferences;
- Social network and "handle" data:
- Telephone number; and
- Birth date.

When you voluntarily do things like:

- Create a mySewnetTM account;
- Purchase or use our products or service;
- Download a software update;
- Subscribe to a newsletter (users who no longer wish to receive our newsletters or promotional materials may opt-out of receiving these communications by clicking the unsubscribe link at the bottom of the email or by contacting us);
- Register for a class at a Viking Sewing Gallery Retail Store;
- Connect to our services;

- Mention or tag us on social media;
- Contact us; or
- Participate in an online survey.

In certain jurisdictions, you may have the right not to provide Personal Information. However, if you elect not to provide such information, you may not be able to utilize certain services on our websites and apps.

Information we collect automatically:

We collect information about your use of our products and services, your interactions with us and our advertising, as well as information regarding your computer or other devices used to access our services, including:

- Your interactions with our email;
- Details of your interactions with our customer service, such as the date, time and reason for contacting us, and if you call us, your phone number;
- Device IDs, User IDs, or other unique identifiers that support user authentication, the registration process, payment processing, and presentation of content to you;
- Device and software characteristics, connection information, and statistics;
- Domain names, IP addresses, browser types, page views, mobile device ID and type which is collected to customize our website to your preferences, manage content, and compile statistics about website usage;
- Information collected via the use of cookies (See our "<u>Cookies and Other Technologies</u>" section below.); and
- Service activation information such as your email address or other contact information.

Information from other sources:

We also obtain information from other sources. We protect this information according to the practices described in this Privacy Policy.

These sources could include payment service providers who provide us with payment information, or updates to that information, based on their relationship with you.

How we use your Personal Information:

We use your Personal Information to provide, analyze, administer, enhance and personalize our products, services, and marketing efforts; to process your registrations, your orders and your payments; and to communicate with you on these and other topics. For example, we use your Personal Information to:

• Keep you posted on SVP Worldwide's latest product announcements, software updates, and upcoming events.

- If you don't want to be on our mailing list, you can opt out anytime by clicking "Unsubscribe" at the bottom of any communication or by contacting us.
- o If you don't want us to show you "targeted advertising" through other companies' sites, like Facebook, Google, Instagram, or Twitter, you can set ad preferences in your social media companies' settings:
 - Facebook
 - Google
 - Instagram
 - Twitter
- Analyze and understand our customers to improve and optimize our products and services (including our user interface experiences).
- Communicate with you concerning your use of our products and services so we can assist you with operation requests such as password reset requests.
- Help us create, develop, operate, deliver, and improve our products, services, content, and advertising.
- Determine appropriate services. For example, our websites are not intended for users under the age of 16.
- Send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with SVP Worldwide, you may not opt out of receiving these communications.
- Administer sweepstakes, contests, or similar promotions.

We also use Personal Information for internal purposes such as auditing, data analysis, and research to improve SVP Worldwide's products, services, and customer communications.

Children

You must be 16 years of age or older to provide your Personal Information to SVP Worldwide. While individuals under the age of 16 may utilize our websites, the may provide their data only with the involvement, supervision, and approval of a parent or legal guardian.

Collection and Use of Non-Personal Information

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

We may collect information such as language, zip code, area code, unique device
identifier, and referrer URL so that we can better understand customer behavior
and improve our products, services, and advertising.

- We may collect information regarding customer activities on our website and from our other products and services. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest.
 Aggregated data is considered non-personal information for the purposes of this Privacy Policy.
- We may collect and store details of how you use our services, including search
 queries. This information may be used to improve the relevancy of results
 provided by our services. Except in limited instances to ensure quality of our
 services over the Internet, such information will not be associated with your IP
 address.
- We collect data about how you use your device and applications in order to help our developers improve our apps.

If we do combine non-personal information with Personal Information the combined information will be treated as Personal Information for as long as it remains combined.

Cookies and Other Technologies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

These technologies help us better understand user behavior, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered Personal Information by local law, we also treat these identifiers as Personal Information. Similarly, to the extent that non-personal information is combined with Personal Information, we treat the combined information as Personal Information for the purposes of this Privacy Policy.

As is true of most Internet services, we gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data.

We use this information to understand and analyze trends, to administer the site, to learn about user behavior on the site, to improve our product and services, and to gather demographic information about our user base as a whole. SVP Worldwide may use this information in our marketing and advertising services.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit www.allaboutcookies.org.

Find out how to manage cookies on popular browsers:

- Google Chrome
- Microsoft Edge
- Mozilla Firefox
- Microsoft Internet Explorer
- Opera
- Apple Safari

To find information relating to other browsers, visit the browser developer's website.

To opt out of being tracked by Google Analytics across all websites, visit http://tools.google.com/dlpage/gaoptout.

Disclosure of Personal Information

We disclose your information for certain purposes and to third parties, as described below:

Companies of SVP Worldwide

We share your information among the companies of SVP Worldwide as needed for: data processing and storage; providing you with access to our services; providing customer support; making decisions about service improvements; and for other purposes described in the How We Use Your Personal Information section of this Privacy Policy. For further information see the Consent to Internal Transfer of Personal Information section below.

Service Providers

We use other companies, agents or contractors ("Service Providers") to perform services on our behalf or to assist us with the provisions of services to you. For example, we engage Service Providers to provide marketing, advertising, communications, infrastructure and IT services; to personalize and optimize our service; to process credit card transactions or other payment methods; to provide customer service; to collect debts, to analyze and enhance data (including data about users' interactions with our service); and to process and administer consumer surveys. In the course of providing such services, these Service Providers may have access to your Personal Information.

We do not authorize Service Providers to use or disclose your Personal Information except in connection with providing their services.

Service Providers outside the European Economic Area ("EEA") may process Personal Information of EEA residents. We will only allow this processing if we are satisfied with the Service Providers commitment to security.

Protection of SVP Worldwide and Others

SVP Worldwide and its Service Providers may disclose and otherwise use your personal and other information where we or they reasonably believe such disclosure is necessary to (a) satisfy an applicable law, regulation, legal process, or government request, (b) enforce applicable terms of use, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address illegal or suspected illegal activities (including payment fraud), security or technical issues, or (d) protect against harm to the rights, property or safety of SVP Worldwide, its users or the public, as required or permitted by law.

Business Transfers

We may disclose your Personal Information in connection with any reorganization, restructuring, merger or sale or other transfer of assets. We will transfer information, including Personal Information, provided that the receiving party agrees to respect your Personal Information in a manner that is consistent with our Privacy Policy.

Whenever in the course of sharing information we transfer Personal Information to countries outside of the EEA and other regions with comprehensive data protection laws, we will ensure that the information is transferred in accordance with this Privacy Policy and as permitted by the applicable laws on data protection.

Protection of Personal Information

SVP Worldwide takes the security of your Personal Information very seriously. When SVP Worldwide stores your personal data, we use computer systems with limited access housed in facilities using physical security measures. These measures are designed to provide a level of security appropriate to the risks of processing your Personal Information. Unfortunately, no measures can be guaranteed to provide 100% security. Accordingly, we cannot guarantee the security of your Personal Information.

Automated Decision-Making

SVP Worldwide does not make any decisions involving the use of algorithms or profiling that significantly affect you.

Your Information and Rights

You can request access to your Personal Information; the correction or update of out-ofdate or inaccurate Personal Information; and to the extent required by law, deletion of the Personal Information we hold about you.

To make requests, or if you have any other question regarding our privacy practices, please contact us. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

We may decline to process requests that are frivolous, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law. To make a request, please contact us.

We may retain information as required or permitted by applicable laws and regulations, including to honor your choices, for our billing or records purposes and to fulfill the purposes described in this Privacy Policy. We take reasonable measures to destroy or deidentify Personal Information in a secure manner when it is no longer required.

Consent to Internal Transfer of Personal Information

All the information you provide may be transferred or accessed by entities around the world as described in this Privacy Policy. As a global organization, data we collect may be transferred internationally throughout SVP Worldwide's worldwide organization and to SVP Worldwide's headquarters in the United States.

Some of the jurisdictions to which data is transferred may not provide the same level of privacy protection as your local jurisdiction. By using and purchasing our products and services and submitting Personal Information through our websites or apps and at our stores, you consent to such transfers of your Personal Information. Without such consent, SVP Worldwide is not able to provide you with access to its online services and other programs made available through our websites and apps.

Personal Information of EEA residents is controlled and processed by **Singer Sourcing Limited**, **LLC**. SVP Worldwide uses approved Model Contractual Clauses for the international transfer of Personal Information collected in the EEA.

Your California Privacy Rights/Notice for California Residents

California residents who have provided Personal Information to SVP Worldwide may obtain information regarding SVP Worldwide's disclosures, if any, of Personal Information to third parties for third-party direct marketing purposes.

Requests must be submitted to the following address: SVP Worldwide, Attn: Data Protection Office, 1714 Heil Quaker Boulevard, Suite 130, La Vergne, TN 37086.

Within 30 days of receiving such a request, we will provide a California Privacy Disclosure, which will include a list of certain categories of Personal Information disclosed during the preceding calendar year to third parties for their direct marketing purposes, along with the names and addresses of the third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the address specified in this paragraph.

Our Company-wide Commitment to Your Privacy

To make sure your Personal Information is secure, we communicate our privacy and security guidelines to SVP Worldwide employees and strictly enforce privacy safeguards within the company.

Privacy Questions

If you have any questions or concerns specifically about SVP Worldwide's Privacy Policy or data processing, or if you would like to make a complaint about a possible breach of local privacy laws, please contact us.

When a privacy question is received we have a dedicated team that triages the contacts and seeks to address the specific concern or query that you are seeking to raise. Where your issue may be more substantive in nature, more information may be sought from you.

All such substantive contacts receive a response. If you are unsatisfied with the reply received, you may refer your complaint to the relevant regulator in your jurisdiction. If you ask us, we will endeavor to provide you with information about relevant complaint avenues that may be applicable to your circumstances.

SVP Worldwide may update its Privacy Policy from time to time. When we change the policy in a material way, a notice will be posted on our website along with the updated Privacy Policy.

SVP Worldwide, 1714 Heil Quaker Boulevard, Suite 130, La Vergne, TN 37086

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