

# DOTF CONCEPT LLC Privacy and Security Policy

*Last updated March 11, 2021*

## **Introducing the Privacy Policy**

This privacy policy (“Privacy Policy”) explains how DOTF CONCEPT LLC (“DOTF” or “we”) collects and processes information from members and users of the website, software applications, and other online services we provide (collectively “DOTF’s products”). DOTF’s products include, but are not limited to, the Ibriz Mobile Application (the “Ibriz Mobile App”), and the website located at [www.dotfconcept.com](http://www.dotfconcept.com) (the “Website”).

If we ever need additional personal information for a specific reason, we will tell you and ask for your permission. Also, to the extent that DOTF has links to other websites (like retailers), please note that we do not own, operate, or control them, and they have their own controlling privacy policies that you should review.

## **What data we collect and why**

In order to provide our products, DOTF collects information that you share directly with us when you use our website or the Ibriz Mobile App. Though you don’t have to, you can choose to provide your email to set up an account with us.

DOTF also collects technical information about your device and use of Ibriz Mobile App to make sure that our products are working correctly. The information we collect is geared to providing DOTF members with a better way to shop online and to help us develop, improve, and market our services. We don’t connect your data with your identity.

## *Account and Profile Information*

When you become a member of the Ibriz Mobile App, you share a limited amount of information during the registration process, optionally including your email address to personalize your profile.

As you continue to use DOTF’s products, you might also provide information when you:

- refer friends from your contacts to the Ibriz Mobile App
- use the Ibriz Mobile App to make a purchase from a retailer
- communicate with DOTF through email or other means

Please note that if you are purchasing an item on a third party merchant's website that is being displayed within the Ibriz Mobile App, then that merchant and not DOTF, will collect, store, and process your payment information in connection with that purchase.

### *Technical Information*

DOTF automatically collects information to ensure that our products work correctly on different devices and browsers. This includes data like:

- the type of device you're using
- the device's unique ID (where available)
- operating system
- browser type
- IP address
- event stamp
- error logs

This data allows us to make sure DOTF products are working correctly, to make your experience better, and to detect and prevent fraud. Also, to help us coordinate our communications and marketing campaigns, and to understand how our users engage with our products, we use common digital tools that allow us to see if you opened an email we sent, visited a link in those emails, or generally interacted with DOTF as a result of our marketing efforts.

### *Shopping and Usage Data*

The information you share, and we collect, enables us to improve our products and gives us insights to provide you with a more tailored, relevant experience or show sponsored product offers that may interest you.

### *Aggregate and Anonymized Data*

We may also use the information we collect in aggregate or otherwise anonymized form. This lets us look at interactions with our site and products generally and does not identify you or any specific person. We use this general data for research, development, marketing, analytics, and to enhance the shopping experience for the Ibriz Mobile App community.

### *What data we do not collect*

We collect information that we believe can help us save our users time and money. This does not include, and we do not collect, any information from your search engine history, emails, or from websites that are not retail sites. We also do not collect bank or credit card information.

## How we share your data

We know how important your personal data is to you, so we will never sell it. None of the data we collect is linked to your identity.

We may share anonymized information with our service providers (businesses that work for and with us) for the purpose of running Ibriz Mobile App and fulfilling our commitments to you. These include businesses that perform services on our behalf, including to help us maintain our products, to provide support for legal, security protection, our own marketing, and customer service. Please know that when we share information with our service providers, it's for the purposes outlined in this Privacy Policy and not for their independent use.

*We may also share information in the following cases:*

- in an aggregate or anonymized format that does not identify any specific person;

## How we protect your data

Employing pseudonymization and anonymization techniques, and more.

## How we use cookies and similar technologies

Like most other online services, DOTF uses cookies, pixel tags, web beacons, and other markers (we'll just call them "cookies") to collect some of the data discussed in this Privacy Policy. These help us operate our products, analyze engagement and usage, and provide a relevant and personalized shopping experience. See below to learn how you can manage your cookie preferences.

Some cookies can be temporary ("session cookies" like those used for navigating your browser) and disappear once you close it. Others last longer ("persistent cookies," like when you ask a site to remember your login) and are saved to your computer until you delete them.

Our uses of cookies and similar technologies fall into the following general categories:

**Essential:** We may use cookies, web beacons, or other similar technologies that are necessary to the operation of our sites, services, applications, and tools. This includes technologies that allow you access to our sites, services, applications, and tools; that are required to identify irregular site behavior, prevent fraudulent activity and improve security;

**Performance:** We may use cookies, web beacons, or other similar technologies to assess the performance of our websites, applications, services, and tools, including as part of our analytic practices to help us understand how our visitors use our websites, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our website content, applications, services, or tools;

**Functionality:** We may use cookies, web beacons, or other similar technologies that allow us to offer you enhanced functionality when accessing or using our sites, services, applications, or tools. This may include identifying you when you sign into our sites or keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content on our sites;

**Marketing:** We may use first-party or third-party cookies and web beacons to deliver content, including ads relevant to your interests, on our sites or within the Ibriz Mobile App. This includes using technologies to understand the usefulness to you of the advertisements and content that have been delivered to you, such as whether you have clicked on an advertisement.

Any personal information that we collect and store through use of these technologies for categories 2 through 4 above are based on your consent, obtained through a conspicuous disclosure on our website during your first visit. You can withdraw this consent in your account settings. If you want to disable cookies entirely, your browser or mobile device might have an option to do that. For more information, including instructions on disabling cookies, please visit: <http://www.allaboutcookies.org/>

### **Your choices for managing your data**

We've made it easy to opt out of DOTF's products at any time.

You can uninstall the Ibriz Mobile App in the same way you would uninstall other mobile apps from your mobile device.

If you would like to delete your personal information, you can always ask us by emailing [privacy@dotfconcept.com](mailto:privacy@dotfconcept.com). We will delete any personal information we have, although the following exceptions apply: (1) we may still store your personal information if we need it to meet our legal or compliance obligations and/or to defend against legal claims; and (2) we may also continue to store your personal data in an aggregated and anonymized format that doesn't identify you and can't be attributed to you, even after you've deleted your profile.

### **Additional rights regarding your data**

Depending on where you live, you may have additional rights as to the personal information that you share and DOTF collects. Residents of the EU, UK, Canada, Australia, New Zealand, and California can see below to learn more.

*EU, UK, Canada, Australia, and New Zealand residents.*

**Controller:** DOTF is a private company, established in the United States of America. Our address is 2138 Treasure Mountain Dr. Spring, Texas, U.S.A. Our contact email address is [privacy@dotfconcept.com](mailto:privacy@dotfconcept.com). For the purposes of the General Data Protection Regulation, we are the data controller.

**Legal Bases:** The personal information that you share and we collect, as well as its purposes, are described in this Privacy Policy. DOTF will only collect or process your personal information if we have a legal basis to do so. These are:

- When you consent to our use of your data for a specific purpose.
- When we need that data to enact a transaction or to provide you with services and products that you request. This includes personalizing features and protecting the security of Ibriz Mobile App and its users.
- When DOTF has a legitimate interest in using that data in the normal ways you'd expect, like ensuring DOTF's products run properly, improving and creating new products, historical analytics research, promoting DOTF, and protecting our legal rights.
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**Your rights:** You have the following rights with regard to your personal data. To exercise any of these rights, please contact us at [privacy@dotfconcept.com](mailto:privacy@dotfconcept.com). Please note that these rights are limited, like for example, where fulfilling your request would adversely affect other individuals or our legal obligations.

**Right to Access:** You have the right to request information about your personal data that we hold, how we use it, and who we share it with.

**Right to Portability:** Where you have provided your personal data to us on the basis of your consent, you have the right to ask us for a copy of this data in a structured, machine-readable format and to ask us to send this data to another data controller.

**Right to Rectification:** You have the right to ask us to correct your personal data where it is inaccurate or incomplete.

**Right to Erasure:** In certain circumstances, you have the right to ask us to delete the personal data we hold about you.

**Right to Withdraw Consent:** In situations where we are processing your personal data based on your consent, you may withdraw this consent at any time.

**Right to Object to Processing:** In situations where we are processing your personal data based on our legitimate interest, you can object that the interest is no longer legitimate. DOTF will stop processing that data, unless we can demonstrate an overriding legitimate ground. You can also request to opt out of direct marketing.

**Right to Restrict Processing:** You have the right to ask us to stop any active processing of your personal data while we seek to verify data you claim is inaccurate, while we verify our legitimate interests, or while we cannot erase that data due to legal obligations.

DOTF will try to respond to these requests within 30 days, but some might take longer. You will typically not be charged any fee for effecting these rights, but DOTF reserves the right to charge a reasonable fee (or refuse to comply) if the request is unfounded, repetitive, or excessive.

**Complaints:** In the event that you wish to make a complaint about how we process your personal data, please contact us at [privacy@dotfconcept.com](mailto:privacy@dotfconcept.com) and we will do our best to resolve it. You can also choose to file a complaint with the relevant data protection authority.

### *California residents*

If you live in California and use DOTF, you have some additional rights when it comes to your data.

- Right to Delete: You can ask us to delete the personal information we have about you.
- Right to Know: You can ask us for a list of the categories of personal information we have about you, the categories of sources from which we get personal information, the business purposes for which we collect personal information, and the categories of third parties with whom it is shared (you can also see that in this Privacy Policy). You also can ask us for a copy of the pieces of personal information we have about you.

California law gives you the right to opt out of the sale of your personal information. But **DOTF does not and will not sell (or rent, or disclose for value) any of your personal information in the first place.**

To exercise any of these rights, you (or your authorized agent) can contact us by email at [privacy@dotfconcept.com](mailto:privacy@dotfconcept.com). We will confirm receipt of your request within 10 days, and will provide a response to you within 45 days of your request, though in some exceptional cases it might take longer (if that happens, we'll let you know). We will need your name and email address to verify your request, and may also ask for additional information if necessary to verify the identity of the person making the request. We reserve the right to deny your request if we cannot verify your identity, or if an exemption applies (for example, where fulfilling your request would adversely affect other individuals, or where we have a conflicting legal obligation). That said, we will not discriminate against you for exercising any of your privacy rights.

To learn about the categories of personal information that DOTF uses, please see the section of this policy called "What data we collect and why." The personal information that we collect falls into the following categories as set out under California law:

- The email address you provide – California law refers to these as identifiers.
- We don't track your location, but your IP address gives us a general idea of the city, state, and country - what California law calls geolocation.

To learn about the limited ways in which we disclose data for our business purposes -- that is, to a service provider -- and the categories of those service providers, please see the section of this policy called "How we share your data."

Lastly, California residents also have the right to request this information in an accessible alternative format. If you have a disability and would like to access this privacy policy in an alternative format, please contact us by email as detailed below.

## **Data Transfers from the EU**

If we transfer your data outside of the European Economic Area, we will do so within the safeguards of Binding Corporate Rules, Model Contract Clauses and the EU-US Privacy Shield framework.

As we are located in the United States and DOTF's products are operated in the United States, if you are located outside of the United States, please be aware that information you share and we collect will be transferred to, and processed, stored, and used in the United States in order to provide DOTF's products to you. The United States does not have an adequacy decision regarding data protection from the European Commission.

## **Minors**

We don't knowingly collect or solicit personal information from children. If you are a child under 18, please do not attempt to use or register for DOTF's products or send any personal information to us.

If we learn we have collected personal information from someone under 18, we will delete that information as quickly as possible. If you are a parent or guardian of a child who you think may have given us some personal information or posted information on any public portion of DOTF's products, please let us know at [privacy@dotfconcept.com](mailto:privacy@dotfconcept.com). We'll help you remove it.

## **Changes to this policy**

We will continue to update our policies and practices as needed. We will notify you of any changes to our Privacy Policy by posting any changes here. If we do, you'll see that the date at the top of this Privacy Policy has changed.

## **How to contact us**

If you have any questions about our privacy policies and practice, please contact us at [privacy@dotfconcept.com](mailto:privacy@dotfconcept.com).