

## Sacred Boudoir Experience Privacy Policy

This Privacy Policy describes how Sacred Boudoir Experience and its affiliates (“we,” “us,” or “Sacred”), process personal information that we collect through the Sacred Boudoir Experience Platform.

### PERSONAL INFORMATION WE COLLECT

**1. Information needed to use the Sacred Boudoir Experience Platform.** We collect personal information about you when you use the Sacred Boudoir Experience Platform. Without it, we may not be able to provide you with all services requested. This information includes:

- **Contact Information, Account, Profile Information.** Such as your first name, last name, phone number, postal address, email address, date of birth, and profile photo, some of which will depend on the features you use.
- **Identity Verification and Payment Information.** Such as images of your government issued ID (as permitted by applicable laws), your ID number or other verification information, bank account or payment account information.

**2. Information you choose to give us.**

You can choose to provide us with additional personal information. This information may include:

- **Additional Profile Information.** Such as gender, preferred language(s), city, and personal description. Some of this information as indicated in your account settings is part of your public profile page and will be publicly visible.
- **Address Book Contact Information.** Address book contacts you import or enter manually.
- **Other Information.** Such as when you fill in a form, add information to your account, respond to surveys, post to community forums, participate in promotions, communicate with our customer care team and other Members, or share your experience with us. This may include health information if you choose to share it with us.

### 3. Information Automatically Collected by Using the Sacred Boudoir Experience Platform and our Payment Services.

When you use the Sacred Boudoir Experience Platform and Payment Services, we automatically collect personal information. This information may include:

- **Usage Information.** Such as the pages or content you view, searches for Vendor Listings, bookings you have made, and other actions on the Sacred Boudoir Experience Platform.
- **Log Data and Device Information.** Such as details about how you've used the Sacred Boudoir Experience Platform, IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data.
- **Payment Transaction Information.** Such as payment instrument used, date and time, payment amount, payment instrument expiration date and billing postcode, PayPal email address, IBAN information, your address and other related transaction details.

### 4. Personal Information We Collect from Third Parties.

We collect personal information from other sources, such as:

- **Third-Party Services.** If you link, connect, or login to the Sacred Boudoir Experience Platform with a third party service (e.g. Google, Facebook, WeChat), you direct the service to send us information such as your registration, friends list, and profile information as controlled by that service or as authorized by you via your privacy settings at that service.
- **Background Information.** For Members in the United States, to the extent permitted by applicable laws, we may obtain reports from public records of criminal convictions or sex offender registrations. We may use your information, including your full name and date of birth, to obtain such reports.
- **Enterprise Product Invitations and Account Management.** Organizations that use our Enterprise products may submit personal information to facilitate account management and invitations to use enterprise products.
- **Referrals and co-travelers.** If you are invited to the Sacred Boudoir Experience Platform, the person who invited you can submit personal information about you such as your email address or other contact information.

- **Other Sources.** To the extent permitted by applicable law, we may receive additional information about you, such as references, demographic data or information to help detect fraud and safety issues from third party service providers and/or partners, and combine it with information we have about you. For example, we may receive background check results or fraud warnings from identity verification service providers for use in our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the Sacred Boudoir Experience Platform, or about your experiences and interactions from our partners. We may receive health information, including but not limited to health information related to contagious diseases.

## **HOW WE USE INFORMATION WE COLLECT**

- 1. Provide, Improve, and Develop the Sacred Boudoir Experience Platform.** We use personal information to:
  - enable you to access the Sacred Boudoir Experience Platform and make and receive payments,
  - enable you to communicate with other Members,
  - perform analytics, debug and conduct research,
  - provide customer service,
  - send you messages, updates, security alerts, and account notifications,
  - if you provide us with your contacts' information such as your friends or co-vendors, we may process this information: (i) to facilitate your referral invitations, (ii) to share your reservation details, (iii) for fraud detection and prevention, and (iv) to facilitate your requests or for any other purpose you authorize,
  - personalize and customize your experience based on your interactions with the Sacred Boudoir Experience Platform, your search and booking history, your profile information and preferences, and other content you submit, and
  - enable your use of our enterprise products.
- 2. Create and Maintain a Trusted and Safer Environment.** We use personal information to:

- detect and prevent fraud, spam, abuse, security and safety incidents, and other harmful activity,
- study and combat discrimination
- conduct security investigations and risk assessments,
- verify or authenticate information provided by you,
- conduct checks against databases and other information sources, including background or police checks,
- comply with our legal obligations, protect the health and well-being of our Clients, Vendors, Vendors' employees and members of the public,
- resolve disputes with our Members,
- enforce our agreements with third parties,
- comply with law, respond to legal requests, prevent harm and protect our rights
- enforce our Terms and other policies, and
- in connection with the activities above, we may conduct profiling based on your interactions with the Sacred Boudoir Experience Platform, your profile information and other content you submit to Sacred Boudoir Experience, and information obtained from third parties. In limited cases, automated processes could restrict or suspend access to the Sacred Boudoir Experience Platform if such processes detect activity that we think poses a safety or other risk to Sacred Boudoir Experience, our community, or third parties.

**3. Provide, Personalize, Measure, and Improve our Advertising and Marketing.** We may use personal information to:

- send you promotional messages, marketing, advertising, and other information based on your preferences and social media advertising through social media platforms,
- personalize, measure, and improve our advertising,
- administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by Sacred Boudoir Experience or its third-party partners,
- analyze characteristics and preferences to send you promotional messages, marketing, advertising and other information that we think might be of interest to you, and
- invite you to events and relevant opportunities.

- 4. Provide Payment services.** Personal information is used to enable or authorize third parties to use Payment Services:
- Detect and prevent money laundering, fraud, abuse, security incidents.
  - Conduct security investigations and risk assessments.
  - Comply with legal obligations (such as anti-money laundering regulations).
  - Enforce the Payment Terms and other payment policies
  - With your consent, send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences.
  - Provide and improve the Payment Services.

## **SHARING AND DISCLOSURE**

### **Sharing With Your Consent or at Your Direction.**

1. Where you provide consent, we share your information as described at the time of consent, such as when authorizing a third-party application or website to access your Sacred Boudoir Experience account or participating in promotional activities by Sacred Boudoir Experience partners or third parties.

Where permissible with applicable law, we may use certain information about you, such as your email address, de-identify it, and share it with social media platforms, to generate leads, drive traffic to Sacred Boudoir Experience or otherwise promote our products and services.

2. **Sharing between Members.**

**To help facilitate bookings or other interactions between Members, we may need to share certain information such as:**

- When a booking request is made or dispute is submitted, certain information may be shared between Client(s) and Vendor(s), including profile, name, names of any additional Clients, cancellation history, review information, age of client (unless prohibited by applicable law), dispute outcome (when applicable) and other information you choose to share and submit. When you as a Vendor have a confirmed booking, certain information is shared with the Client to coordinate the booking, such as your profile, full name, phone number, and Vendor Service Listing.
- When you as a Vendor invite another Member to be a Vendor with you, you authorize that person to access and update your information and Member Content, including but not limited to certain information like your full name,

phone number, Studio address, calendar, Service Listing information, Service Listing photos, and email address.

### **3. Information You Publish in Profiles, Listings, and other Public Information.**

You can make certain information publicly visible to others, such as:

- Your public profile page, which includes your profile photo, first name, description, and city.
- Reviews, ratings and other public feedback.
- Content in a community or discussion forum, blog or social media post.

We may display parts of your public profile and other Content you make available to the public like Listing details on third-party sites, platforms and apps.

Information you share publicly on the Sacred Boudoir Experience Platform may be indexed through third-party search engines.

### **4. Vendor Service Providers.**

Vendors may use third-party services to help manage or deliver their services, such as delivery and packaging services. Vendors may use features on the Sacred Boudoir Experience Platform to share information about the Client (like booking/reservation dates, Client name, Client phone number) with such third-party service providers.

### **5. Complying with Law, Responding to Legal Requests, Preventing Harm and Protecting our Rights.**

We may disclose your information to courts, law enforcement, governmental or public authorities, tax authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or where disclosure is reasonably necessary: (i) to comply with our legal obligations, (ii) to comply with a valid legal request or to respond to claims asserted against Sacred Boudoir Experience, (iii) to respond to a valid legal request relating to a criminal investigation to address alleged or suspected illegal activity, or to respond to or address any other activity that may expose us, you, or any other of our users to legal or regulatory liability, (iv) to enforce and administer our agreements with Members, or (v) to protect the rights, property or personal safety of Sacred Boudoir Experience, its employees, its Members, or members of the public.

Where appropriate, we may notify Members about legal requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon or harm to Sacred Boudoir Experience, our Members, or expose Sacred Boudoir Experience to a claim of obstruction of justice.

## **6. Service Providers.**

We share personal information with affiliated and unaffiliated service providers to help us run our business, including service providers that help us: (i) verify your identity or authenticate your identification documents, (ii) check information against public databases, (iii) conduct background or police checks, fraud prevention, and risk assessment, (iv) perform product development, maintenance and debugging, (v) allow the provision of the Sacred Boudoir Experience Services through third-party platforms and software tools, (vi) provide customer service, advertising, or payments services, (vii) process, handle or assess insurance claims or similar claims, or (viii) facilitate non-profit and charitable activities consistent with Sacred Boudoir Experience's mission. These providers are contractually bound to protect your personal information and have access to your personal information to perform these tasks.

## **7. Business Transfers.**

If Sacred Boudoir undertakes or is involved in any merger, acquisition, reorganization, sale of assets, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of our assets, including your information in connection with such transaction or in contemplation of such transaction (e.g., due diligence). In this event, we will notify you before your personal information is transferred and becomes subject to a different privacy policy.

## **8. Corporate Affiliates.**

To support us in providing, integrating, promoting and improving the Sacred Boudoir Platform, Payment Services, and our affiliates' services, we may share personal information within our corporate family of companies that are related by common ownership or control. Some examples are:

- **Sharing with Sacred Boudoir Experience Payments.** In order to facilitate payments on or through the Sacred Boudoir Experience Platform, certain information will be shared with the relevant Sacred Boudoir Experience Payments entity.

## **9. Linking Third-Party Accounts.**

You can link your Sacred Boudoir Experience account with certain third-party services like social networks. Your contacts on these third-party services are referred to as “Friends.” When you direct the data sharing by creating this link:

- some of the information provided to us from linking accounts may be published on your public profile,
- your activities on the Sacred Boudoir Experience Platform may be displayed to your Friends on the Sacred Boudoir Experience Platform and/or that third-party service,
- a link to your public profile on that third-party service may be included in your Sacred Boudoir Experience public profile,
- other Sacred Boudoir Experience users may be able to see any Friends that you may have in common with them, or that you are a Friend of their Friend if applicable,
- other Sacred Boudoir Experience users may be able to see any schools, hometowns or other groups you have in common with them as listed on your linked social networking service,
- information you provide to us from the linking of your accounts may be stored, processed and transmitted for fraud prevention and risk assessment purposes, and
- publication and display of information that you provide to the Sacred Boudoir Experience Platform through this linkage is subject to your settings and authorizations on the Sacred Boudoir Experience Platform and the third-party service.

## **10. Third-Party Partners & Integrations.**

Parts of Sacred Boudoir Experience may link to third-party services, not owned or controlled by Sacred Boudoir Experience. Use of these services is subject to the privacy policies of those providers. Sacred Boudoir Experience does not own or



control these third parties and when you interact with them you are providing your information to them.

## **YOUR RIGHTS**

You can exercise any of the rights described in this section consistent with applicable law. Please note that we may ask you to verify your identity and request before taking further action on your request.

### **1. SECURITY**

While no organization can guarantee perfect security, we are continuously implementing and updating administrative, technical, and physical security measures to help protect your information.

### **2. CHANGES TO THIS PRIVACY POLICY**

We reserve the right to modify this Privacy Policy at any time in accordance with applicable law. If we do so, we will post the revised Privacy Policy and update the "Last Updated" date. In case of material changes, we will also provide you with notice of the modification by email at least thirty (30) days before the effective date. If you disagree with the revised Privacy Policy, you can cancel your Account. If you do not cancel your Account before the date the revised Privacy Policy becomes effective, your continued access to or use of the Sacred Boudoir Experience Platform will be subject to the revised Privacy Policy.

