

PRIVACY POLICY

Massage Luxe International, LLC (“we”, “our”, “Company”) values its customers, their personal information, their privacy and their trust. This Privacy Policy (“Policy”) explains how we collect, use and protect information collected through our website. Specifically, this Policy applies to our collection, use, processing, storage, and transfer of information associated with the Company’s website at www.massageluxe.com (the “Site”). If there is something you do not understand about our privacy practices, please feel free to contact us at info@massageluxe.com. [Please provide appropriate email address.]

Throughout this Policy, we refer to the term “Personal Information.” “Personal Information” is data which identifies, describes, is associated with, or could be linked to, an individual, such as a name, birthdate, postal address, email address, telephone number, driver’s license, Social Security number, credit card number, or the like.

Personal Information does not include anonymous or aggregated data that cannot be used to identify a specific person, even if combined with other data. Some users of the Site are businesses, companies, institutions, or other entities, rather than individuals. We do not consider Business Information, such as title, employer’s name, work email, work phone number, work address, and other similar business information, to be Personal Information.

Information We Collect

User-Provided Information

When you contact us, submit information, make an inquiry, make a purchase, register for an appointment, sign up for a newsletter, ask to receive communications from the Company, apply for a position, inquire about franchise opportunities, or set up an account, we will collect certain personal information from you. This may include, for example, your name, email address, postal address, phone number, credit card data, or other information you may provide or we may request. We may use this information to communicate with you, to provide products or services, to provide information about products, services or businesses, to process a transaction, and otherwise as needed to operate our business. We keep this information only for as long as is reasonably necessary for the purposes for which it was collected. [Confirm]

From time to time, the Site may enable users to register or establish an account by providing login credentials, such as a user name and password, which Company will retain to allow access to the user’s online account. When establishing an online account, please use unique login credentials and do not share them with anyone else or allow them to be disclosed to anyone else. We encourage you to treat this information as you would any other confidential information.

Other Information Collected

In addition to collecting information directly from you as described in the previous section, we also automatically gather information when you browse or view our Site. This information may include Internet Protocol (IP) address, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, clickstream data, whether you are a first-time or a returning user, links you clicked on while

using the Site, and your flow and navigation path through the Site. **[Confirm]** We use this information to make sure that the Site and associated features are functioning properly, that the Site is displayed properly for your equipment and software, and that we can provide you with information useful to you and your location.

There are “do not track” or similar browser choices available to Internet users with respect to online web activity, but given the present lack of consensus of what constitutes an informed election, appropriate trigger or breadth of scope of such choice, our Site will not operate any differently when a “do not track” signal is received. **[Confirm]**

In some of our email messages, you may find a “click-through URL” linked to content on our Site. We track this click-through data to help us determine interest in particular topics and to measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click on such links. **[Confirm]**

Cookies and Other Tracking Technologies

We use technologies such as “cookies” to help us understand how users use and navigate the Site and so we can remember certain information about Site users and their preferences when they return to the Site. Cookies enable us to compile aggregate data about Site traffic and Site interaction so we can improve our Site and enhance the user experience. A cookie is a text file that is stored on your device. Most browsers are set to accept cookies automatically. You can set your browser to decline all cookies automatically or to prompt you for a response each time a cookie is offered. If you decline cookies, you may find that you cannot access all the features of our Site.

We also use log files, web beacons and pixel tags when you visit our Site. **[Confirm]** Log files track IP addresses, browser type, Internet Service Provider (ISP) identity, referring/exit pages, platform type, date/time stamp, and number of clicks. We utilize this information in our legitimate interest in administering the Site, to prevent fraud, track website navigation in the aggregate, and gather broad demographic information for aggregate use. Web beacons or clear GIFs, may also be used in combination with cookies. Often transparent, these images are part of web pages, and allow us to count users who have visited certain pages and to generate statistics about how our Site is used. They are not used to access Personal Information. Pixel tags enable us to send email messages in a format that customers can read and they tell us whether email has been opened. We may use this information to reduce or eliminate email messages sent to customers.

Use of Personal Information

We may use Personal Information to further our legitimate business interests, to transact business, to provide information about Company and its services and products, and to communicate with users of our Site. For example, we may use Personal Information to respond to an inquiry, to send you information you have requested, and to personalize Content for you. We may use Personal Information to compile, analyze, and better understand user data, demographics and behavior, and to detect, investigate, and prevent activities that may violate our policies or applicable laws. We may also use Personal Information to communicate with you about products and services we believe you might find of interest and to administer promotions, surveys, contests and sweepstakes in which you might participate.

We also use the non-identifiable information automatically collected about you during your use of the Site, as described above, to improve the effectiveness of our website, operations, mobile experience, and/or marketing efforts, to guard against fraud and theft, and otherwise to protect Site visitors and our business.

Our employees and agents may view your Personal Information to perform their jobs and service your needs and the Site operations. They will have access to your Personal Information as may be reasonably necessary to provide you with products, services or information, or for one of the other reasons listed in this policy. In many cases such individuals will have a contractual obligation to protect the privacy of that information.

Sharing Your Personal Information

As a general rule, we do not sell information we collect from you. **[Confirm]** We will not share or disclose your Personal Information without your consent, except as outlined in this Policy and as may reasonably be needed to conduct our business in a lawful manner.

For instance, we may share your Personal Information with our business partners, as outlined above, to assist us in operating the Site and transacting business and communicating with you. When we do so, we will exercise reasonable care to ensure that such partners are prohibited from using that information for any other reason and that such information is maintained securely.

We may release your Personal Information to others (including law enforcement) if we believe such release is reasonably necessary to comply with the law or legal process; to enforce the provisions of the Terms of Use or this Privacy Policy; to detect, prevent, or otherwise address fraud, security or technical issues; or to otherwise protect the rights, property or safety of the Company or others.

We may sell, transfer and/or disclose your Personal Information as part of a business divestiture, sale, merger, transaction, or acquisition of all or a part of our business. If another company acquires our company, business, or assets, that company will possess the Personal Information collected by us and will assume the rights and obligations regarding your Personal Information as described in this Privacy Policy. In the event of an insolvency, bankruptcy, or receivership, your Personal Information may also be transferred as a business asset.

In addition, we may share aggregate, non-individual information, incapable of identifying a particular person, with third parties for lawful purposes. **[Confirm]**

Site Not Directed to Children Under 13

Our Site is not directed to children under the age of 13 and we do not knowingly collect Personal Information from children under 13. Children under 13 should not provide Personal Information to us through the Site or otherwise. If we learn that Personal Information belonging to anyone under the age of 13 is provided to us or stored on our Site, we will immediately delete such information and refrain from using it for any purpose. **[Confirm]**

California Privacy Rights

If you are a California resident, you may have certain rights with respect to your personal information, such as:

- 1) the right to know, by way of our Privacy Policy and any specific inquiries you direct to us, where personal information we have about you comes from, what we use that information for, whether it is being disclosed or sold, and to whom it is being disclosed or sold;
- 2) the right to “opt-out” of the Company’s sale of your personal information to any third parties;
- 3) the right, with some exceptions, to have your personal information deleted from the Company’s possession or control; and
- 4) the right to receive equal service and pricing from the Company even if you exercise any of your privacy rights.

California Civil Code Section 1798.83 permits users of the Site who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, or if you have any questions or concerns about your California privacy rights, our Privacy Policy, or our use of your Personal Information, please send an e-mail to info@massageluxe.com [Please confirm email address] or write to us at:

Massage Luxe International, LLC
Attn: California Privacy Rights
11 Champion Drive
Fenton, MO 63026 USA

For all California residents, any such inquiries shall be responded to within forty-five (45) days and at no cost to you. Company will use information you have provided to us in connection with your activity on the Site to verify your identity in connection with any inquiries related to your rights noted in this Section.

If you are a California resident under the age of 18, and a registered user of any Site where this policy is posted, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to info@massageluxe.com. [Please provide email address] Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

European Privacy Rights

If you are an EU resident, you are afforded certain rights regarding your personal information. For example, EU residents have the following rights:

- 1) The right to be informed about what happens with one’s Personal Data (information relating to an identified or identifiable natural person), including how it is collected

- and used, the right to access Personal Data, the right to modify it when it is incomplete or incorrect, and the right to withdraw consent for its use;
- 2) The right to access Personal Data held by organizations about an individual;
 - 3) The right to rectification allowing individuals to correct inaccurate information or complete incomplete information;
 - 4) The right to erasure (or the right to be forgotten) allowing, with some exceptions, an individual to have his or her Personal Data deleted upon request;
 - 5) The right to restrict and withdraw consent for data processing;
 - 6) The right to data portability allowing individuals to ask for the transfer of their Personal Data or to obtain and use their Personal Data for their own purposes;
 - 7) The right to object, with some exceptions, to the processing of an individual's Personal Data;
 - 8) The right to prevent automated decision making or profiling and to require that those decisions be made by natural persons.

If you have questions or concerns about these rights and how they relate to this Privacy Policy or the Site, please direct your inquiries to info@massageluxe.com [Please provide email address] or write to us at:

Massage Luxe International, LLC
Attn: European Privacy Rights
11 Champion Drive
Fenton, MO 63026 USA

Links to Other Websites

You may be able to post content to third-party Social Networking Sites (such as Facebook, Instagram, LinkedIn, and Twitter) on which we maintain a presence. If you choose to do this, we will provide information to the Social Networking Site(s), and receive information from them, in accordance with your elections. You acknowledge and agree that you are solely responsible for your use of such websites and that it is your responsibility to review the applicable terms of use and privacy policies. We are not responsible for the availability, accuracy, content, products or services of third-party Social Networking Sites.

While you are using Company's Site, you may be linked or directed to other third-party websites that are beyond our control. These third-party websites may have privacy policies and terms of use which differ from ours. Please carefully review these policies. We are not responsible for any actions, inactions, or policies of such third parties.

Data Movement

We may store and maintain your Personal Information on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from, and may be less protective than, the data protection laws of your jurisdiction.

We process data, including Personal Information, in the United States. We transfer your Personal Information to another organization or a country only with your consent or to perform a contract with you, and consistent with the practices described in this Privacy Policy.

Security Measures

We maintain a variety of industry-standard security measures, including physical, electronic and procedural safeguards. For instance, we use SSL encryption technology for all credit card numbers, passwords, and registration information you provide us. **[Confirm this will be the case]** No system or Site can be completely secure, so we do not promise, and you should not expect, that your Personal Information, searches, or other communications will always remain secure.

Your Access and Consent to Use of your Personal Information

If you believe that the Personal Information that we have collected about you is incomplete, inaccurate, or not up to date, or if you would like to review and/or request changes or deletion of that information, you can contact us at info@massageluxe.com. **[Confirm]**

If you do not consent, or if you wish to withdraw your previously given consent, for us to collect, use, or disclose your Personal Information as described in this Policy, please contact us at info@massageluxe.com. **[Confirm]** In your request, please identify the Personal Information at issue and the collection, use, or disclosure you wish to stop.

Denying or withdrawing consent may mean that we will not be able to provide certain products, services or information you request or certain offers, opportunities or promotional messages Company would ordinarily provide.

You may opt-out of receiving marketing-related emails by clicking the "unsubscribe" link at the bottom of any email you receive from us or our agents. **[Confirm]** You may opt-out of or stop additional text messages by following the instructions in a text. If you are having difficulty unsubscribing from any of our marketing-related communications, please contact us at info@massageluxe.com. **[Confirm]**

Even if you opt-out from receiving marketing-related emails or text messages, we may still need to send you communications about your account, orders, customer service matters, employment inquiries, franchise opportunity information, and other transactional, business-related matters.

If you agree to receive future marketing communications directly from a third party through our Site, you will need to contact that third party to opt-out of such communications. This process may be outlined on that third party's privacy policy. Please keep in mind that we do not have control over third party information or privacy-related practices.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. Changes and clarifications will take effect immediately upon their posting on the Site and the "Effective Date" will be updated accordingly.

Questions and Contact Information

If you would like to: access, correct, amend or delete any Personal Information we have about you, communicate a concern or complaint, or simply want more information, you may contact us at:

Massage Luxe International, LLC
Attn: Privacy Manager
11 Champion Drive
Fenton, MO 63026 USA
info@massageluxe.com [Please provide email address]

Effective Date: [Insert Date]