

## Privacy Policy for 46 Degrees Services

Effective Date: February 14, 2017

### **Your Privacy Rights**

This Privacy Policy describes your privacy rights regarding our collection, use, storage, sharing and protection of your personal information. It applies to the 46 Degrees website and all related sites, applications, services and tools regardless of how you access or use them.

### **Scope and Consent**

You accept this Privacy Policy when you sign up for, access, or use our products, services, content, features, technologies or functions offered on our website and all related sites, applications, and services (collectively “46 Degrees Services”). This Privacy Policy is intended to govern the use of 46 Degrees Services by our users (including, without limitation those who use the 46 Degrees Services in the course of their trade or business) unless otherwise agreed through contract. We may amend this Privacy Policy at any time by posting a revised version on our website. The revised version will be effective as of the published effective date. In addition, if the revised version includes a substantial change, we will provide you with 30 days’ prior notice by mail communication. After this 30-day notice period, you will be considered as having expressly consented to all amendments to this Privacy Policy.

### **Collection of Personal Information**

We collect the following types of personal information in order to provide you with the use of 46 Degrees Services, and to help us personalize and improve your experience.

**Information we collect automatically:** When you use 46 Degrees Services, we collect information sent to us by your computer, mobile phone or other access device. The information sent to us includes, but is not limited to, the following: data about the pages you access, computer IP address, device ID or unique identifier, device type, geo-location information, computer and connection information, mobile network information, statistics on page views, traffic to and from the sites, referral URL, ad data, and standard web log data and other information. We also collect anonymous information through our use of cookies and web beacons.

**Information you provide to us:** We may collect and store any information you provide us when you use 46 Degrees Services, including when you add information on a web form, add or update your account information, participate in community discussions, chats, or dispute resolutions, or when you otherwise correspond with us regarding 46 Degrees Services.

When you use 46 Degrees Services, we also collect information about your transactions and your activities. In addition, if you open a 46 Degrees account or use 46 Degrees Services, we may collect the following types of information:

- Contact information, such as your name, address, phone, email and other similar information.
- Detailed personal information such as your date of birth or national ID number.
- Location data, when you use 46 Degrees Services we may collect your location via geo reference. We may also collect the precise location of your device when the app is running in the foreground or background. We may also derive your approximate location from your IP address.

We may also collect information from or about you from other sources, such as through your contact with us, including our customer support team, your results when you respond to a survey, your interactions with members of the 46 Degrees corporate family or other companies (subject to their privacy policies and applicable law), and from other accounts we have reason to believe you control (whether in part or in whole). Additionally, for quality and training purposes or for its own protection, 46 Degrees may monitor or record its telephone conversations with you or anyone acting on your behalf. By communicating with 46 Degrees, you acknowledge that your communication may be overheard, monitored, or recorded without further notice or warning.

**Information from other sources:** We may also obtain information about you from third parties such as credit bureaus and identity verification services.

You may choose to provide us with access to certain personal information stored by third parties such as social media sites (e.g., Facebook and Twitter). The information we may receive varies by site and is controlled by that site. By associating an account managed by a third party with your 46 Degrees account and authorizing 46 Degrees to have access to this information, you agree that 46 Degrees may collect, store and use this information in accordance with this Privacy Policy.

**Authentication and Fraud Detection:** In order to help protect you from fraud and misuse of your personal information, we may collect information about you and your interactions with 46 Degrees Services. We may also evaluate your computer, mobile phone or other access device to identify any malicious software or activity.

**Using Your Mobile Device:** We may offer you the ability to connect with 46 Degrees Services using a mobile device, either through a mobile application or via a mobile optimized website. The provisions of this Privacy Policy apply to all such mobile access and use of mobile devices.

When you download or use our mobile applications, or access one of our mobile optimized sites, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as advertising, search results, and other personalized content. Most mobile devices allow you to control or disable location services in the device's setting's menu. If you have questions about how to disable your device's location services, we recommend you contact your mobile service carrier or the manufacture of your particular device.

## **How We Use the Personal Information We Collect**

Our primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customized experience. We may use your personal information to:

- provide 46 Degrees Services and customer support;
- process transactions and send notices about your transactions;
- verify your identity, including during account creation and password reset processes;
- resolve disputes, collect fees, and troubleshoot problems;
- manage risk, or to detect, prevent, and/or remediate fraud or other potentially prohibited or illegal activities;
- detect, prevent or remediate violations of policies or applicable user agreements;
- improve the 46 Degrees Services by customizing your user experience;
- measure the performance of the 46 Degrees Services and improve their content and layout;
- manage and protect our information technology infrastructure;
- provide targeted marketing and advertising, provide service update notices, and deliver promotional offers based on your communication preferences;

We may contact you via electronic means or postal mail to notify you regarding your account, to troubleshoot problems with your account, to resolve a dispute, to collect fees or monies owed, to poll your opinions through surveys or questionnaires, or as otherwise necessary to service your account. Additionally, we may contact you to offer coupons, discounts and promotions, and inform you about 46 Degrees Services and the services of our corporate family. Finally, we may contact you as necessary to enforce our policies, applicable law, or any agreement we may have with you. When contacting you via phone, to reach you as efficiently as possible we may use, and you consent to receive, autodialed or prerecorded calls and text messages as described in our User Agreement. Where applicable and permitted by law, you may decline to receive certain communications.

## **Marketing**

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. We may combine your personal information with information we collect from other companies and use it to improve and personalize 46 Degrees Services, content, and advertising. If you do not wish to receive marketing communications from us or participate in our ad-customization programs follow the directions that may be provided within the communication or advertisement.

We respect your communication preferences. If you no longer wish to receive notifications via our application, you can adjust your preferences by visiting the settings page of the application.

## **How We Use Cookies and Similar Technologies**

When you access our website or use 46 Degrees Services, we (including companies we work with) may place small data files on your computer or other device. These data files may be cookies, pixel tags, e-tags, "Flash cookies," or other local storage provided by your browser or associated applications (collectively "Cookies"). We use these technologies to recognize you as a customer; customize 46 Degrees Services, content, and advertising; measure promotional effectiveness; help ensure that your account security is not compromised; mitigate risk and prevent fraud; and to promote trust and safety across our sites and 46 Degrees Services.

You are free to decline our Cookies if your browser or browser add-on permits, unless our Cookies are required to prevent fraud or ensure the security of websites we control. However, declining our Cookies may interfere with your use of our website and 46 Degrees Services.

**Do Not Track:** Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not currently respond to DNT signals. We do, however, provide you notice of the tracking by advertisers and other third parties in our Privacy and Cookies policies.

## **How We Protect and Store Personal Information**

Throughout this Privacy Policy, we use the term "personal information" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been made anonymous so that it does not identify a specific user.

We store and process your personal information on our computers in South and North America and elsewhere in the world where our facilities are located. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls.

## **How We Share Personal Information with Other 46 Degrees Users**

When transacting with others, we may provide those parties with information about you necessary to complete the transaction, such as your name, account ID, contact details, shipping and billing address, or other information needed to promote the reliability and security of the transaction. If a transaction is held, fails, or is later invalidated, we may also provide details of the unsuccessful transaction. To facilitate dispute resolution, we may provide a buyer with the seller's address so that goods can be returned to the seller. The receiving party is not allowed to use this information for unrelated purposes, such as to directly market to you, unless you have agreed to it.

We work with third parties, including merchants, to enable them to accept or send payments from or to you using 46 Degrees. In doing so, a third party may share information about you with us, such as your email address or mobile phone number, to inform you that a payment has been sent to you or when you attempt to pay a merchant or third party. We use this information to confirm that you are a 46 Degrees customer and that 46 Degrees as a form of payment can be enabled, or to send you notification of payment status. Also, if you request that we validate your status as a 46 Degrees customer with a third party, we will do so.

Please note that merchants, sellers, and users you buy from or contract with have their own privacy policies, and although 46 Degrees user agreement does not allow the other transacting party to use this information for anything other than providing 46 Degrees Services, 46 Degrees is not responsible for their actions, including their information protection practices.

### **How We Share Personal Information with Other Third Parties**

We may share your personal information we collect from you, including your name, contact details, and transactions and activities, with:

- Companies that we plan to merge with or are acquired by. (Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal information. If your personal information could be used contrary to this policy, you will receive prior notice.)
- Law enforcement, government officials, or other third parties pursuant to a subpoena, court order, or other legal process or requirement applicable to 46 Degrees or one of its affiliates; when we need to do so to comply with law or credit card rules; or when we believe, in our sole discretion, that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our User Agreement.
- Other unaffiliated third parties, for the following purposes:
  - Fraud Prevention and Risk Management: to help prevent fraud or assess and manage risk. For example, if you use the 46 Degrees Services to buy or sell goods using eBay Inc. or its affiliates (“eBay”), we may share account information in order to help protect your accounts from fraudulent activity, alert you if we detect such fraudulent activity on your accounts, or evaluate credit risk.

As part of our fraud prevention and risk management efforts, we also may share necessary account information with eBay in cases where 46 Degrees has placed a hold or other restriction on your account based on disputes, claims, chargebacks or other scenarios regarding the sale or purchase of goods. Also, as part of our fraud prevention and risk management efforts, we may share account information with eBay to enable them to operate their programs for evaluating buyers or sellers.

- Customer Service: for customer service purposes, including to help service your accounts or resolve disputes (e.g., billing or transactional).
  - Shipping: in connection with shipping and related services for purchases made using 46 Degrees.
  - Legal Compliance: to help them comply with anti-money laundering and counter-terrorist financing verification requirements.
  - Service Providers: to enable service providers under contract with us to support our business operations, such as fraud prevention, bill collection, marketing, customer service and technology services. Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.
- Other third parties with your consent or direction to do so.

Please note that these third parties may be in other countries where the laws on processing personal information may be less stringent than in your country.

If you open a 46 Degrees account directly on a third party website or via a third party application, any information that you enter on that website or application (and not directly on a 46 Degrees website) will be shared with the owner of the third party website or application. These sites are governed by their own privacy policies and you are encouraged to review their privacy policies before providing them with personal information. 46 Degrees is not responsible for the content or information practices of such third parties.

### **How You Can Access or Change Your Personal Information**

You can review and edit your personal information at any time by logging in to your account and reviewing your account settings and profile. If you are not able to edit your personal information you can contact us in [ayuda@46degrees.net](mailto:ayuda@46degrees.net)

### **How You Can Contact Us about Privacy Questions**

If you have questions or concerns regarding this Privacy Policy, you should contact us by writing us to [ayuda@46degrees.net](mailto:ayuda@46degrees.net)