

## PRIVACY POLICY

Last Updated March 31, 2021

We at Laura DiFrancesco LLC (“Laura DiFrancesco LLC,” “we,” “us,” or “our”) have created this privacy policy (this “Privacy Policy”) because we know that you care about how information you provide to us is used and shared. This Privacy Policy applies to our information collection and use practices in connection with: (i) our websites, including, without limitation, lauradifrancesco.co, lauradifrancesco.kartra.com, flourishcoworking.com, and deanstreetlaw.com (the “Websites”); and (ii) the information you provide to us offline, including, without limitation, via phone and email.

### **Description of Users and Acceptance of Terms**

This Privacy Policy applies to visitors to the Websites, who view only publicly-available content (“Visitors”), and users who register with us (“Registered Users”) and wish to purchase a product or service through one of our Websites.

By visiting any of our Websites, Visitors are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use.

By registering with us and purchasing a product or service through one of our Websites, each Registered User is agreeing to the terms of this Privacy Policy, the accompanying Terms of Use.

By providing us information offline, you are also agreeing to the terms of this Privacy Policy.

Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Use and the Terms and Conditions of Purchase.

### **GDPR and Privacy Shield Notice**

Natural persons located in the European Economic Area (“EEA”) should review the General Data Protection Regulation (“GDPR”) and Privacy Shield Notice.

In addition, the Privacy Shield Notice should be reviewed if your personal information is transferred from the EEA or Switzerland to the US, pursuant to the E.U.-U.S. or Swiss-U.S. Privacy Shield.

## **The Information We Collect/or Receive; the Purpose of Collection and Use**

In the course of operating the Websites and/or interacting with you, we will collect (and/or receive) the following types of information.

### **1. Contact Information.**

When you sign up to receive any of our newsletters, respond to a survey, register for a class, purchase any product or service, or sign up to become our affiliate partner, you may be required to provide us with certain information about yourself, such as your name, address, e-mail address, address, social media information, phone number, PayPal address (only if you sign up to become our affiliate partner) and SSN#/Tax ID# (only if you sign up to become our affiliate partner) (the “Contact Information”). The Contact Information is used to provide the requested product or service or information and to contact you for purposes of direct marketing of our current and future products and services.

If you land on one of our pages through an affiliate partner link and provide us Contact Information (e.g., to request information, purchase a product or service), we may share your name and e-mail address to such affiliate partner to let him/her know that you were referred and in case (s)he has offered you any bonuses or rewards for following their referral link. We have no control over how affiliate partners may use your information after it has been received and we are not responsible for fulfilling any bonuses that such affiliate partners may have offered you; where applicable, please check such affiliate partners’ privacy policies and terms of use for more information on how they may use your personal information.

### **2. Order Information.**

When you place an Order, you must provide us with certain information about the products and services you are seeking to purchase. Such information is collectively called the “Order Information.” The Order Information is used to fulfill your Order.

### **3. Billing Information.**

When you wish to purchase a product or service, you will be required to provide certain information in addition to the Personal Information and Order Information noted above. Such information may include a debit card number, credit card number, expiration date, billing address, activation codes, and similar information. Such information is collectively called the “Billing Information.” Billing Information is collected and processed by our third-party payment processor operating as our agent (see, Onward Transfers to Third Parties). We do not directly obtain or process any Billing Information.

#### **4. Other Information.**

In addition to the information noted above, we may collect additional information (collectively, the “Other Information”). Such Other Information may include:

**a. From You.** Additional information about yourself that you voluntarily provide to us (e.g., via a survey), such as household income range, gender, product and service preferences, and other information that does not identify you personally.

**b. From Your Activity.** Information that we automatically collect when you use the Websites, including, without limitation:

- IP addresses, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device; browser type and language; referring and exit pages and URLs; date and time; amount of time spent on particular pages; what sections of the Websites you visit; and similar data; and
- Information about your device, including the type of device; universally unique ID (“UUID”); advertising identifier (“IDFA”); MAC address; operating system and version (e.g., iOS, Android or Windows); carrier and country location; hardware and processor information (e.g., storage, chip speed, camera resolution, NFC enabled); network type (WiFi, 3G, 4G, LTE); and similar data.

**c. From Cookies.** Information that we collect using “cookie” technology. Cookies are small packets of data that a website stores on your computer’s or mobile device’s hard drive so that your computer will “remember” information about your visit. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us collect Other

Information and to enhance your experience using the Websites. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser's documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Websites may not function properly. For more information about our use of cookies, please refer to our Cookie Policy.

**d. Third-Party Analytics.** We use third-party analytics services (such as Google Analytics) to evaluate your use of the Websites, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the Websites and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing and using the Websites, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Websites.

Below is a list of analytics providers that we use; however, such list may be subject to change based on how we wish to understand the user experience and we will endeavor to update it diligently. You may use the accompanying links to learn more about such providers and, if available, how to opt-out from their analytics collection.

For Google Analytics, please visit: <https://www.google.com/analytics>

**e. From Other Sources.** We also may collect or receive information from third parties, such as Facebook and/or other third-party social media sites.

#### **Information Collected by or Through Third-Party Advertisers/Remarketers**

We may share Other Information about you with third parties, including, but not limited to, advertising and remarketing providers, or other brand partners, for purposes of personalizing or otherwise understanding how you engage with ads or other content. These third parties may use cookies, pixel tags (also called web beacons or clear gifs), or other technologies to collect Other Information in furtherance of such purposes, including to tailor, target (i.e., behavioral, contextual, retargeting, and remarketing), analyze, report on, and/or manage advertising campaigns or other initiatives. For example, when

a browser visits a site, pixel tags enable us and these third-parties to recognize certain cookies stored within the browser to learn which ads or other content bring a user to a given site. In addition, we may receive Other Information from these third parties, including through their service providers, such as advertising identifiers, IP addresses, and post-conversion data.

Below is a list of advertising/remarketing providers that we use; however, such list may be subject to change based on the campaigns that we run and we will endeavor to update it diligently. You may use the accompanying links to learn more about such providers and, if available, how to opt-out from their targeted ads or other personalization features. Please note you will not necessarily be opted-out of advertising or content generally; you may still receive generic ads or content.

For Facebook, please visit: <http://www.facebook.com/about/privacy>

For Twitter, please visit: <https://twitter.com/en/privacy>

For Google, please visit: <https://support.google.com/ads/answer/2662922?hl=en>

In addition, you may opt-out of interest-based advertising by participating providers by visiting <http://www.networkadvertising.org> and <http://www.aboutads.info/choices> for details on how to do so.

### **Information Collected Through the Websites that is Not Covered by this Privacy Policy**

You may post and/or share information, including but not limited to, comments using forums and other similar features available through the Websites. NONE of the information you provide using these features is protected by this Privacy Policy. THIS PRIVACY POLICY DOES NOT APPLY TO ANY INFORMATION (INCLUDING PERSONAL INFORMATION) THAT YOU PROVIDE USING ANY SUCH FEATURES. ALL SUCH INFORMATION IS PUBLIC INFORMATION AND MAY BE SEEN, COLLECTED OR USED BY ANY USER OF THE WEBSITES. Please note that if you post and/or share information on our Websites through your Facebook account, such information will be subject to Facebook's privacy policy.

### **Aggregate Data**

In an ongoing effort to better understand our visitors, customers, and our products and services, we may analyze the Order Information and Other Information in aggregate form in order to operate, maintain, manage, and improve the Websites and/or our products and services. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our products and services to current and prospective business partners and to other third parties for other lawful purposes.

### **Additional Uses**

We also use information collected pursuant to this Privacy Policy to provide our services; to process Orders; to administer our rewards and promotional programs; to maintain and improve our Websites and services to you; to solicit your feedback; and to inform you about our products and services and those of our third-party marketing partners.

### **Sharing with Third Parties**

Like many businesses, we contract with other companies to perform certain business-related services. We may disclose your information, including personal information in some cases, to certain types of third-party companies, but only to the extent needed to enable them to provide such services, including, without limitation, technical assistance, order fulfillment, customer service, marketing assistance, payment processing, survey collection, promotional and marketing assistance, and business operations. These other companies will have access to your information, including personal information in some cases, only as necessary to perform their functions and to the extent permitted by law. We may also disclose your information, including any personal information, to any of our parent companies, subsidiaries, affiliates, joint ventures, or other companies under common control with us in order to support delivery of our products and services.

### **Business Transfer**

In the event of a merger, dissolution, or similar corporate event or the sale of all or substantially all of our assets, we expect that the Information that we have collected and/or received, including personal information, would be transferred to the surviving entity in a merger or to the acquiring entity. All such transfers shall be subject to our commitments with respect to the privacy

and confidentiality of such personal information as set forth in this Privacy Policy.

### **Disclosures to Public Authorities**

In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also disclose personal information to other third parties when compelled to do so by government authorities or required by law or regulation including, but not limited to, in response to court orders and subpoenas.

### **Opt-Out for Direct Marketing**

You may opt out at any time from the use of your personal information for direct marketing purposes by e-mailing the instructions to this email address: [laura@lauradifrancesco.co](mailto:laura@lauradifrancesco.co). Please allow us a reasonable time to process your request.

### **Accessing and Modifying Personal Information and Communication Preferences**

Upon request to [laura@lauradifrancesco.co](mailto:laura@lauradifrancesco.co), we will provide you with confirmation as to whether we are processing your personal information, and have the data communicated to you within a reasonable time. You have the right to correct, amend, or delete your personal information where it is inaccurate or has been processed in violation of this Privacy Policy. We may require payment of a non-excessive fee to defray our expenses in this regard. Please allow us a reasonable time to respond to your inquiries and requests.

In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any Laura DiFrancesco LLC marketing email. Customers cannot opt out of receiving transactional e-mails related to their account or their Orders. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases.

### **Information You Share on Public Forums**

We feature or may in the future feature public forums such as message boards or web logs, webinars, classes, telephone conferences, or coaching calls, user comments, chat rooms, and similar activities (collectively, “Public Forums”). You may voluntarily post and share information through such Public Forums. NONE of the information you provide to through the Public Forums or through use of these features are protected by this Privacy Policy including any personal information. THIS PRIVACY POLICY DOES NOT APPLY TO ANY INFORMATION (INCLUDING PERSONAL INFORMATION) THAT YOU PROVIDE USING ANY SUCH FEATURES. ALL SUCH INFORMATION IS PUBLIC INFORMATION AND MAY BE VIEWED, COLLECTED, USED, MODIFIED AND/OR DISCLOSED FOR ANY PURPOSE BY US, ANY USER OF THE PUBLIC FORUM, AND THE PUBLIC.

You should think carefully before disclosing any information in any Public Forum.

### **How We Protect the Information**

We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction, taking into account the risks involved in processing and the nature of such data, and in compliance with applicable laws and regulations. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the Information that you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, e-mail sent to or from the Websites may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

### **Retention of Personal Information**

We will retain your personal information in a form that identifies you only for as long as it serves the purpose(s) for which it was initially collected as stated in this Privacy Policy, subsequently authorized, or as allowed under applicable law.

### **Important Notice to Non-U.S. Residents**

It is important to note that the Websites and their servers are operated in the United States. If you are located outside of the U.S., please be aware that any information provided to or collected by us, including personal information,

will be transferred from your country of origin to the U.S. Except in the case of data transfers under the EU-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield Framework, your decision to provide such data to us, or allow us to collect such data through our Websites, constitutes your consent to this data transfer.

## **Children**

We do not knowingly collect personal information from children under the age of 13 through the Websites. If you are under 13, please do not give us any personal information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide personal information through the Websites without their permission. If you have reason to believe that a child under the age of 13 has provided personal information to us, please contact us, and we will endeavor to delete that information from our databases.

## **California Residents**

Laura DiFrancesco LLC does not monitor, recognize, or honor any behavioral advertising opt-out or do not track mechanisms, including general web browser "Do Not Track" settings and/or signals.

California residents should review their specific rights under the California Consumer Privacy Act (CCPA).

## **External Websites**

The Websites may contain links to third-party websites. We have no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or other websites to which we provide links. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

## **Changes to This Privacy Policy**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. By accessing the Websites and/or using our services after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please

be aware that, to the extent permitted by applicable law, our use of the Information is governed by the Privacy Policy in effect at the time we collect the Information. Please refer back to this Privacy Policy on a regular basis.

### **How to Contact Us**

If you have questions about this Privacy Policy, please contact us via:

Email: [laura@lauradifrancesco.co](mailto:laura@lauradifrancesco.co)

Telephone: 1 (610) 692-7000

Or write to us at:

Laura DiFrancesco LLC  
1121 West Chester Pike  
West Chester, PA 19382