Stem & Thistle Privacy Policy

This website domain, www.stemandthistlefloral.com ("Website"), is owned and operated by Stem and Thistle LLC (referred to as "Stem & Thistle" herein). Stem & Thistle is a boutique floral studio specializing in distinct and organically elegant design ("Services"). Use of this Website and any sub-domains constitutes acceptance of this Privacy Policy ("Privacy Policy") and our Terms of Use. If you do not accept this Privacy Policy, you should immediately terminate use of this Website.

Throughout the Privacy Policy, the words "I," "we," "me," "us," "my," or "our" refer to the business entity, Stem & Thistle. The words "you" or "your" refer to any user of this Website.

DEFINITIONS

Personal Data: Any information relating to an identified or identifiable natural person.

Processing: Any operation or set of operations that is performed on Personal Data or on Sets of Personal Data.

DATA PROTECTION PRINCIPLES

Stem & Thistle follows the following data protection principles:

- a) Processing is lawful, fair, and transparent. Our processing activities are lawful. We always consider your rights before processing any Personal Data. We will provide you information regarding processing upon request.
- b) Processing is limited to the purpose for which the data is processed.
- c) Processing is done with the minimal amount of data. We only gather and process the minimal amount of Personal Data required for any purpose.
- d) Processing is limited to a certain time. We will not store Personal Data longer than necessary.
- e) We will do our best to ensure the accuracy of any data we store.
- f) We will do our best to ensure the integrity and confidentiality of all data we store.

YOUR RIGHTS

You, as the person whose data is being processed ("Data Subject"), have the following rights:

- a) Right to Information: You have the right to know whether your Personal Data is being processed; what data is gathered, from where it is obtained and why and by whom it is processed.
- b) Right to Access: You have the right to access the data collected from and about you. This includes your right to request and obtain your Personal Data gathered.
- c) <u>Right to Rectification</u>: You have the right to request rectification or erasure of your Personal Data that is inaccurate or incomplete.
- d) Right to Erasure: In certain circumstances, you may request for your Personal Data to be erased from our records.
- e) <u>Right to Restrict Processing</u>: Where certain conditions apply, you have the right to restrict processing of your Personal Data.

- f) Right to Object to Processing: In certain cases, you have the right to object to processing of your Personal Data, for example, in the case of direct marketing.
- g) Right to Object to Automated Processing: You have the right to object to automated processing, including profiling, and not to be subject to a decision based solely on automated processing. You may exercise this right whenever there is an outcome of the profiling that produces legal effects concerning or significantly effecting you.
- h) Right to Data Portability: You have the right to obtain your Personal Data in a machine-readable format, or if it is feasible, as a direct transfer from one processor to another.
- i) Right to Lodge a Complaint: If we refuse your request under the Right to Access, we will provide you with a reason as to why. If you are not satisfied with the way your request has been handled, please contact us at hello@stemandthistlefloral.com.
- j) Right to Withdraw Consent: You have the right to withdraw any given consent for processing of your Personal Data.

DATA WE GATHER

Information you have Provided to Us. This might include, but is not limited to, your name and email address. Mainly, information that is necessary for providing you with a product and/or service or to enhance your experience with our Website and Stem & Thistle. We save the information you provide to us for you to receive email newsletters, receive promotional material, receive communication directly from Stem & Thistle, and for you to perform other activities on Stem & Thistle's Website.

Information Automatically Collected About You. This includes information that is automatically stored by cookies and other session tools. For example, your IP address. This information is used to improve your user experience. When you use our Website, your online activities may be logged.

Publicly Available Information. We might gather information about you that is publicly available.

Any Information You Provide. Any sensitive personal information you provide solely to us will be considered confidential and will be safeguarded to the best of our ability. This does not include any information you post or submit to Stem & Thistle publicly, for example, through reviews or comments on Stem & Thistle's Website and social media pages.

HOW WE USE YOUR PERSONAL DATA

We use your Personal Data to:

- a) Provide our Website to you, including but not limited to providing you with other products and services that you
 have requested, providing you with promotional items at your request, and communicating with you in relation
 to those products and services, communicating and interacting with you, and notifying you of changes to any
 services;
- b) Enhance your user experience;
- c) Fulfill an obligation under law or contract;
- d) Gain information via Google Analytics such as the country in which you reside in and how many pages you visit on our site; and
- e) Ensure you are a real person and not a bot when leaving comments and reviews and submitting information via Stem & Thistle.

We only use your Personal Data for legitimate reasons.

We may process your Personal Data for the following purposes:

- a) To identify you;
- b) To provide you a service and to send or offer you a product or service;
- c) To send you emails after you have submitted your information and subscribed to our email list;
- d) To send you personalized offers (from us and our carefully selected partners) and emails;
- e) To administer and analyze our visitor and client base (behavior and history) to improve the quality, variety, and availability of our Website, Services, and products offered and provided; and
- f) To conduct questionnaires concerning client satisfaction.

So long as you have not informed us otherwise, we consider offering you our Services and products that are similar or the same to your browsing behavior to be in our legitimate interest.

We may process your Personal Data to fulfill obligations arising from any legal matter and use your Personal Data as required by law. We reserve the right to use anonymous Personal Data gathered in any way we see fit. We may use the anonymous data outside the scope of this Privacy Policy only when it is made anonymous.

We save and store your email address and name, when submitted by you, so that we can send you emails and email newsletters to which you can unsubscribe at any time.

We may process your Personal Data for additional purposes that are not mentioned here but are compatible with the original purpose for which the data was gathered. To do this, we will ensure the following:

- a) The link between the purposes, content, and nature of Personal Data is suitable for further processing;
- b) The further processing would not harm your interests; and
- c) There would be appropriate safeguards for processing.

WHO ELSE CAN ACCESS YOUR PERSONAL DATA

We do not share your Personal Data with third parties other than the connected third parties described below.

CONNECTED THIRD PARTIES

We only work with processing partners who can ensure adequate levels of protection to your Personal Data. We disclose your Personal Data to third parties who are performing services for us, such as the servers for our email communications who are solely provided access to your email address when submitted by you for purposes of sending emails from Stem & Thistle to you. We may disclose your Personal Data to public officials if we are legally obligated to do so.

HOW WE PROTECT YOUR DATA

We do our best to keep your Personal Data safe. We use protocols for communication and transferring data (such as HTTPS). We use anonyms and pseudonyms where suitable. We monitor Stem & Thistle for possible vulnerabilities and attacks with security software.

With that said, we cannot guarantee the security of information. However, if, to our knowledge, any data breaches occur, we will notify suitable authorities. We will also notify you if there is a threat to your rights or interests. We will do what we reasonably can to prevent such security breaches and to assist authorities should any breaches occur.

TRANSFER OF YOUR PERSONAL DATA

If we undergo a business transaction, such as a merger, acquisition, or sale of all or a portion of our assets, your Personal Data may be among the assets transferred. You acknowledge and consent that such transfers may occur and are permitted under this Privacy Policy and that any acquirer of our assets may continue to process your Personal Data as set forth in this Privacy Policy.

CHILDREN

We do not intend to collect or intentionally collect information from children. We do not target children with our Website.

COOKIES AND OTHER TECHNOLOGY

We use cookies and similar technologies to analyze reader behavior, administer our Website, track users' movements, and to collect information about users. This is done to personalize and enhance your user experience.

A cookie is a tiny text file stored on your computer. Cookies are information that is used to help make sites work. Only we can access the cookies created by our Website. You can control your cookie settings at the browser level. Choosing to disable cookies may hinder your use of certain functions.

WE USE COOKIES FOR THE FOLLOWING PURPOSES

- a) <u>Necessary Cookies</u>: These cookies are required for our Website to function properly.
- b) <u>Functionality Cookies</u>: These cookies provide functionality that makes using our Website more convenient and makes providing more personalized features possible. For example, they might remember your name and email in any online forms so that you do not have to re-enter this information next time when commenting or submitting information.
- c) Analytics Cookies: These cookies are used to track the use and performance of our Website.

You can remove cookies stored on your computer via your browser settings.

We use Google Analytics to measure traffic on our Website. Google has its own privacy policy, which you can review on your own. If you'd like to opt out of tracking by Google Analytics, visit the <u>Google Analytics opt-out page</u>.

CHANGES TO THIS PRIVACY POLICY

We reserve the right, at our sole discretion, to update, change, or replace any part of this Privacy Policy by posting updates and changes to our Website. It is your responsibility to check our Website periodically for changes.

Your continued use of and access to Stem & Thistle and our Website following the posting of any changes to this Privacy Policy constitutes acceptance of those changes.

CONTACT INFORMATION

Questions or concerns about this Privacy Policy should be sent to hello@stemandthistlefloral.com.