

Privacy Notice

March 13, 2019

Sweet Castle LLC (“Sweet Castle” or “us” or “we”) is committed to protecting your information. This Website Privacy Notice (the “Privacy Notice”) applies to your use of Sweet Castle’s website (“Website”), including www.sweet-castle.com; www.sweet-castle.us; and www.sweet-castle.info; and describes how Sweet Castle collects, uses, and shares your information when you visit the Website. It does not apply to information collected by Sweet Castle offline or to third party websites, applications, or services (including our affiliates).

Contact Information

Sweet Castle LLC is located at 2714 S. 9th. Ave., Broadview, IL 60155. Should you have any comments or questions about how we collect and use your personal information, communication can be directed to Sweet Castle’s postal address, via email to privacy@sweet-castle.de or by telephone to (708) 731-3896.

Applicability & Eligibility

Applicability

Before accessing, using, or interacting with the Website you should carefully review the terms and conditions of this Privacy Notice. Your use of the Website is further governed by our Terms of Service, which is also incorporated into your agreement with Sweet Castle by this reference.

Eligibility To Use The Website

The Website is not directed to children under the age of 18. You may not use the Website if you are under the age of 18. If you are under the age of 18, you should not provide any information on our Website.

Information Collection & Use

Sweet Castle collects information about you and your use of the Website through various means, including when you provide information to us and when we automatically collect information about you when you access, use, or interact with the Website. Such processing is performed to provide you with the Website. By accepting our Privacy Notice and Terms of Service, you are confirming you have read and understand our policies including how and why we use your information.

The types of information Sweet Castle may collect about you include:

Information You Provide To Us:

We process information you provide to us on the legal basis of Sweet Castle’s legitimate interests in performing the function or service you requested. Where appropriate, we may rely on alternate legal bases, such as your consent to certain types of processing.

Account Information: Website users may be permitted to register for an account (a “Website Account”). We do not currently require you to register to use our Website. However where Sweet Castle does offer Website Accounts, only registered users will be permitted to gain access to those areas and features of the Website that require registration. Sweet Castle will collect certain information about you in connection with your registration for a Website Account, which may include personal data and other information such as a username and password.

Payment Transaction Information: Sweet Castle works with Service Providers (as defined below) such as PayPal and Stripe to handle payment transactions through the Website. Sweet Castle does not itself collect or maintain your credit card or other financial account information; this information is handled for Sweet Castle by our Service Providers. You are subject to the Privacy Policies and Terms and Conditions of our Service Providers when utilizing a third party service through the Sweet Castle Website. Please review the Service Providers’ Privacy Policies and Terms and Conditions before using their services.

Correspondence Information: If you subscribe to our mailing list or email us, we may keep your message, email address, and contact information to respond to your requests, provide the requested products or Website, and to provide notifications or other correspondences to you. We do not share or sell any personal information to other organizations for commercial purposes. If you do not want to receive communications from us in the future, please let us know by sending us an e-mail requesting the same to privacy@sweet-castle.de or by following the unsubscribe instructions found in any e-mail we send. If you supply us with your postal address on-line, you may receive periodic mailings from us with information on new products and services or upcoming events. If you do not wish to receive such mailings, please let us know by contacting us at privacy@sweet-castle.de or by calling our phone number provided above. Please note requests to remove your email address from our lists may take some time to fulfil. We may also still contact you as needed to provide important announcements or notifications regarding the Website.

Support Information: You may provide information to us via a support request submitted through the Website. We will use this information to assist you with your support request and may maintain this information to assist you or other users with support requests. Please do not submit any information to us via a support submission, including confidential or sensitive information that you do not wish for Sweet Castle or our Service Providers to have access to or use in the future.

Form Information: We may use forms to request certain information from you on the Website, such as your contact information to assist with contacts or service requests. This information may include personal data.

Information We Collect Automatically:

We use automatic data collection and analytics technologies to collect aggregate and user-specific information about your equipment, domain name, patterns of use, communication data and the resources that you access and use on the Website, including your IP address, browsing and navigation patterns. This information is used to improve our Website. We process information collected automatically on the legal basis of Sweet Castle's legitimate interests in assessing the use of its Website. Information we collect automatically through your use of the Website includes:

Cookies, Web Beacons, Links, And Other Tracking Technologies: Sweet Castle may keep track of how you use and interact with the Website through the use of cookies, web beacons, links, and other tracking technologies. We do this to help analyze the use of and improve the Website. Through these technologies we may automatically collect information about your use of the Website and other online activities, including our email correspondences, third-party services, and client applications, and certain online activities after you leave the Website. Link information is generally only analyzed on an aggregate basis. Some Website features may not function properly if you disable cookies. Such data may include analytics information, sites visited before visiting the Website, browser type, operating system, and tracking of your interactions with our content and emails.

We partner with third parties to manage our advertising on other sites. Our third-party partners may use cookies or similar technologies in order to provide you with advertising based upon your browsing activities and interests.

Unique Identifiers: When you use or access the Website, we may access, collect, monitor, store on your device, and/or remotely store one or more "Unique Identifiers," such as a universally unique identifier ("UUID"). A Unique Identifier may remain on your device persistently, to help you log in faster and enhance your navigation through the Website. Some features of the Website may not function properly if use or availability of Unique Identifiers is impaired or disabled.

Analytics Information: We use data analytics to ensure site functionality and improve the Website. We use mobile analytics software to allow us to understand the functionality of the Website on your phone. This software may record information such as how often you use the Website, what happens within the Website, aggregated usage, performance data, app errors and debugging information, and where the Website was downloaded from. We do not link the information we store within the analytics software to any personally identifiable information that you submit within the mobile application.

Log File Information: When you use our Website, we may receive log file information such as your IP address, browser type, access times, domain names operating system, the referring web page(s), pages visited, location, your mobile carrier, device information (including device and application IDs), search terms, and cookie information. We

receive log file data when you interact with our Website, for example, when you visit our website, sign into our Website, or interact with our email notifications. Sweet Castle uses log file data to provide, understand, and improve our Website, and to customize the content we show you. Sweet Castle may link this log file to other information Sweet Castle collects about you via the Website.

Public Information: Sweet Castle may also collect information about you from publicly available sources. Information you make publicly available in any public or open forum, such as on a social network, may be considered public information for the purposes of this Privacy Notice, and may be accessed and collected by Sweet Castle. Please be aware that any content or information you share with or provide to third parties using or related to your use of the Website is neither private, nor confidential. Sweet Castle is not responsible for any content or information you post or share with third parties. If you do not wish for certain information to be public, please do not share it publicly.

Information Use

Sweet Castle uses the information we receive about you for the purposes described in this Privacy Notice. We process personal data received about you through our Website on the legal basis of Sweet Castle's legitimate interests in providing the Website and their functionality to you. Such processing is necessary for the purposes of the legitimate interests pursued by Sweet Castle or by our Service Providers related to the Website. Where appropriate, we may rely on alternate legal bases, such as your consent to certain types of processing.

Information Sharing

When you access or use the Website, we collect, use, share, and otherwise process your personal information as described in this Privacy Notice. Sweet Castle will not share, sell, rent, or otherwise disclose your private personal information to third parties without your consent, except in the limited circumstances described in this Privacy Notice, including to:

Aggregated Non-Personal Data: We may disclose aggregated, non-personal data received from providing the Website, including information that does not identify any individual, without restriction. Sweet Castle may share demographic information with business partners, but it will be aggregated and de-personalized, so that personal information is not revealed.

Within Sweet Castle: We may share and process information internally within Sweet Castle and with our subsidiaries and affiliates. Sweet Castle's personnel may have access to your information as needed to provide and operate the Website in the normal course of business. This includes information regarding your use and interaction with the Website.

Service Providers: Sweet Castle works with various organizations and individuals to help provide the Website to you ("Service Providers"), such as website and data hosting companies and companies providing analytics information, like Google Analytics. Sweet Castle needs to engage such third-party Service Providers to help us operate, provide, and market the Website. These third parties have only limited access to your information and may use your information only to perform these tasks on our behalf. Information we share to our Service Providers may include both information you provide to us and information we collect about you, including personal data and information from data collection tools like cookies, web beacons, and log files.

Sweet Castle takes reasonable steps to ensure that our Service Providers are obligated to reasonably protect your information on Sweet Castle's behalf. If Sweet Castle becomes aware that a Service Provider is using or disclosing information improperly, we will take commercially reasonable steps to end or correct such improper use or disclosure.

We share personal information with our Service Providers on the legal basis of Sweet Castle's legitimate interests in providing you with the Website. Our engagement of Service Providers is often necessary for us to provide the Website to you, particularly where such companies play important roles like helping us keep our Website operating and secure. In some other cases, these service providers aren't strictly necessary for us to provide the Website, but help us make it better, like by helping us conduct research into how we could better serve our users. In these latter cases, we have a legitimate interest in working with service providers to make our Website better.

Business Transactions: Sweet Castle may purchase other businesses or their assets, sell our business assets, or be involved in a bankruptcy, merger, acquisition, reorganization or sale of assets (a “Business Transaction”). Your information, including personal data, may be among assets sold or transferred as part of a Business Transaction.

Safety and Lawful Requests: We may be required to disclose Website user information pursuant to lawful requests, such as subpoenas or court orders, or in compliance with applicable laws. We generally do not disclose user information unless we have a good faith belief that an information request by law enforcement or private litigants meets applicable legal standards. We may share your information when we believe it is necessary to comply with applicable laws, to protect our interests or property, to prevent fraud or other illegal activity perpetrated through the Website or using the Sweet Castle name, or to protect the safety of any person. This may include sharing information with other companies, lawyers, agents, or government agencies. Nothing in this Privacy Notice is intended to limit any legal defenses or objections that you may have to a third party’s, including a government’s, request to disclose your information.

Your Rights and Choices Regarding Your Information

Your Rights

Sweet Castle seeks to ensure all individuals are provided with the rights mandated by their governing jurisdiction. Not all of the rights discussed herein will apply to each individual data subject and may not apply to you depending upon your jurisdiction.

You may benefit from a number of rights in relation to your information that we process. Some rights apply only in certain limited cases, depending on your location. If you would like to manage, change, limit, or delete your personal information, you can do so by contacting us. Upon request, Sweet Castle will provide you with information about whether we hold any of your personal information. In certain cases where we process your information, you may also have a right to restrict or limit the ways in which we use your personal information. In certain circumstances, you also have the right to request the deletion of your personal information, and to obtain a copy of your personal information in an easily accessible format.

To the extent that such rights are mandated by the laws applicable to the individual data subject, such as the European Union General Data Protection Regulation (“GDPR”), the following rights may apply: the right to access (GDPR, Article 15); the right to rectification (GDPR, Article 16); the right to erasure (GDPR, Article 17); the right to restrict processing (GDPR, Articles 18); the right of object (GDPR, Article 21); and if applicable, the right to data portability (GDPR, Article 20). You may also have a right to lodge a complaint with an appropriate data privacy regulatory authority (GDPR, Article 77).

If we process your information based on our legitimate interests as explained in this Privacy Notice, or in the public interest, you can object to this processing in certain circumstances. In such cases, we will cease processing your information unless we have compelling legitimate grounds to continue processing or where it is needed for legal reasons. Where we use your data for direct marketing purposes, you can always object using the unsubscribe link in such communications or changing your account settings.

Where you have provided consent to certain data processing, you have the right to withdraw that consent at any time by contacting Sweet Castle at: privacy@sweet-castle.de. A withdrawal of consent will not affect the validity of our use of your personal data up until the point you have withdrawn your consent.

Access To The Information Sweet Castle Has Collected About You

Sweet Castle welcomes you to contact us regarding the information we have collected about you, including regarding the nature and accuracy of the data that has been collected about you, to request an update, modification, or deletion of your information, to opt-out of certain Website uses of your information, or to withdraw any consent you may have granted to Sweet Castle.

Please note requests to delete or remove your information do not necessarily ensure complete or comprehensive removal of the content or information posted in all cases. These requests will be handled according to applicable laws

and regulations. Please note that if you choose to delete your information or opt-out of the collection and use of your information, you understand that certain features, including but not limited to access to the Website or certain areas of the Website, may no longer be available to you.

We may retain the information we receive about you for as long as necessary to fulfil our contractual and legal obligations, or indefinitely where required or permitted, but information generally will be retained only for as long as necessary to fulfill the purposes for which the information was collected, or as otherwise required by law. In addition, we may delete your personal data from our systems as part of a data retention plan. Following termination or deactivation of a Website Account, Sweet Castle may retain your information and content for a commercially reasonable time for backup, archival, and audit purposes.

Opting-Out Of Communications From Sweet Castle

Users may opt-out of receiving certain communications from Sweet Castle by following the unsubscribe process described in an email communication, or by contacting us using the contact information provided above. However, please note you may not opt-out of Website-related communications, such as account verification, changes or updates to features of the Website, or technical and security notices.

Do Not Track

Sweet Castle does not currently employ a process for automatically responding to “Do Not Track” (DNT) signals sent by web browsers, mobile devices, or other mechanisms. Per industry standards, third parties may be able to collect information, including personal data, about your online activities over time and across different websites or online services when you use Website. You may opt out of online behavioral ads at <http://www.aboutads.info/choices/>. You also may limit certain tracking by disabling cookies in your web browser.

Information Security

Security Of Your Information

Sweet Castle takes reasonable efforts to secure and protect the privacy, accuracy, and reliability of your information and to protect it from loss, misuse, unauthorized access, disclosure, alteration and destruction. Sweet Castle implements security measures as we deem appropriate and consistent with industry standards. As no data security protocol is impenetrable, Sweet Castle cannot guarantee the security of our systems or databases, nor can we guarantee that personal information we collect about you will not be breached, intercepted, destroyed, accessed, or otherwise disclosed without authorization. Accordingly, any information you transfer to or from Website is provided at your own risk.

Please do your part to help us keep your information secure. You are responsible for maintaining the confidentiality of any password and Website Account you create via the Website, and are fully responsible for any activities that occur under your password or Website Account. Sweet Castle specifically reserves the right to terminate your access to the Website and any contract you have with Sweet Castle related to the Website in the event it learns or suspects you have disclosed your Website Account or password information to an unauthorized third party.

Additional Provisions Regarding The Website & Your Information

Transfer And Storage Of Your Information

Please be advised information Sweet Castle collects about you may be transferred, processed and/or accessed by us in the United States, or another country where we, or our Service Providers operate. Please be aware that the privacy laws and standards in certain countries, including the rights of authorities to access your personal information, may differ from those that apply in the country in which you reside. If you are located outside the United States and choose to allow us to collect information about you, please be aware that Sweet Castle may transfer your personal data to the United States and process and store it there. We will transfer personal information only to those countries to which we are permitted by law to transfer personal information, and we will take steps to ensure that your personal information continues to enjoy appropriate protections.

If you are located in the European Economic Area ("EEA") or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information to a country or jurisdiction that does not have the same data protection laws as your jurisdiction, as disclosed in this Privacy Notice. It may also be processed by staff operating outside the EEA who work for us or for one of Service Providers, also as disclosed.

Safely Using Sweet Castle's Website

Despite Sweet Castle's safety and privacy controls, we cannot guarantee the Website are entirely free of illegal, offensive, or otherwise inappropriate material, or that you will not encounter inappropriate or illegal conduct from other users when using the Website. You can help Sweet Castle by notifying us of any unwelcome contact by contacting us using the information below.

Your California Privacy Rights

Under California Civil Code Section 1798.83 (known as the "Shine the Light" law) and/or additional laws that may become effective in California, Sweet Castle customers to which the laws of California apply may request certain information about our collection, use, and disclosure of their personal information as described in applicable laws. To make such a request, please write to us at the address below or at privacy@sweet-castle.de with "Request for California Privacy Information" on the subject line and in the body of your message. We will comply with your request within thirty (30) days or as otherwise required by the applicable law.

Changes to Our Privacy Notice

Sweet Castle may modify this Privacy Notice from time to time. The most current version of this Privacy Notice will govern our use of your information. You may contact us to obtain prior versions. We will notify you of material changes to this policy by posting a notice at the Website or by emailing you at an email address associated with your Website Account, if applicable, and provide an "at a glance" overview of any changes.