

# PRIVACY POLICY

## Welcome to Sparrow Imports!

Sparrow Imports values your privacy. values your privacy and the protection of your personal data. This privacy policy describes what information we collect from you, how we collect it, how we use it, how we obtain your consent, how long we keep it in our databases and, if necessary, with whom we share it.

By using the website and services, you are accepting the practices described in this Privacy Policy. Use of the website and services is also subject to our Terms and Conditions.

This Privacy Policy may change from time to time. Your continued use of the website and services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates. This Privacy Policy has been developed and is maintained in accordance with all applicable federal and international laws and regulations and specifically with the California Online Privacy Protection Act (CalOPPA – U.S regulation).

## 1. GENERAL INFORMATION

The personal data of the users that are collected and processed through the website:

- <https://sparrowimports.com>

Will be under responsibility and in charge of:

- **Sparrow Imports.**
- **Sommer Walker- [sommer@sparrowimports.com](mailto:sommer@sparrowimports.com)**

(Hereinafter referred to as Sparrow Imports).

## 2. TYPES OF INFORMATION GATHERED

The information we learn from customers helps personalize and continually improve your experience at Sparrow Imports. Here are the types of information we gather:

**Information You Give Us.** You provide information when you search, read and view content on our website, contract our services, provide content through our services and/or communicate with us through our contact information or our contact forms. As a result of those actions, you might supply us with the following information:

- First and last name
- Company information
- Email address
- Phone number (includes WhatsApp number)
- Address

- ZIP/Postal code
- User content
- IP address
- Any additional information relating to you that you provide to us directly through our website or indirectly through our website or online presence such as 'cookies'.

Sparrow Imports will not collect any personally identifiable information about you, unless you provide it.

**Information Collected Automatically:** By accessing and using the website you automatically provide us with the following information:

- The device and usage information you use to access the website
- Your IP address
- Browser and device characteristics
- Operating system
- Referring URLs
- Your location
- What parts of the website you use and how often

If you access the website through a mobile phone, we will collect the following information:

- Mobile device ID
- Model and manufacturer
- Operating system
- Version information
- IP address

**GOOGLE Analytics.** We use Google Analytics provided by Google, Inc., USA ("Google"). These tool and technologies collect and analyze certain types of information, including IP addresses, device and software identifiers, referring and exit URLs, feature use metrics and statistics, usage history, media access control address (MAC Address), mobile unique device identifiers, and other similar information via the use of cookies. The information generated by Google Analytics (including your IP address) may be transmitted to and stored by Google on servers in the United States. We use the GOOGLE Analytics collection of data to enhance the website and improve our service.

Please consult Google's privacy policy here:

- <https://policies.google.com/privacy>

**Facebook Pixel:** Our website uses the Facebook Pixel. Through the Facebook Pixel we can collect user information for different purposes. We use the Facebook Pixel for the following purposes:

- Collect statistics about our platform (for example, the number of users who visited a page).
- Collect information about how you interact with our platform (for example, whether you opened or followed links contained in them).
- Personalize online services and marketing communications.

- Tailor advertisements to users and optimize advertising campaigns.

The information collected through the Facebook Pixel will be collected and stored by Facebook and will be treated in accordance with its privacy policy. The information we collect through the Facebook Pixel does not personally identify the user and will never be used for purposes other than those contained in this privacy policy and Facebook's privacy policy.

Please consult Facebook's privacy policy here:

- <https://www.facebook.com/privacy/explanation>

**Social Media:** On our website you will find links and functions linked to different social media, where you can share your information.

It is advisable to consult the privacy policy and data protection of each social network used on our website.

- Facebook: <https://www.facebook.com/privacy/explanation>
- Instagram: <http://instagram.com/about/legal/privacy/>

### **3. HOW LONG WE KEEP YOUR DATA**

Personal data provided by users through the website and services will be kept for the time necessary for the provision of the services. Sparrow Imports may be allowed to retain personal data for a longer period whenever the user has given consent to such processing, as long as such consent is not withdrawn. Furthermore, Sparrow Imports may be obliged to retain personal data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority. Once the retention period expires, personal data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

### **4. HOW WE USE YOUR INFORMATION.**

In general, we use the information we collect primarily to provide, maintain, protect and improve our current website and services. We use personal information collected through our site as described below and described elsewhere in this Policy to:

- Identify you as a user in our system.
- Provide the services.
- Send invoices to customer's email.
- Improve our services, website, and how we operate our business.
- Understand and enhance your experience using our website and services.
- Respond to your comments or questions through our support team.
- Send you related information, including confirmations, invoices, technical notices, updates, security alerts and support and administrative messages.
- Communicate with you about upcoming events, offers and news about services offered by Sparrow Imports and our selected partners.

- Marketing purposes of Sparrow Imports.
- Link or combine your information with other information we get from third parties to help understand your needs and provide you with better service.
- Protect, investigate and deter against fraudulent, unauthorized or illegal activity.

## 5. HOW DO YOU GET MY CONSENT?

By hiring and using the services, communicating with us through the contact forms or our contact information, accepting the use of cookies by our website and providing us with personal information to communicate with you, you consent to our collection, storage and use of your information on the terms contained in this privacy policy. You consent to the use of cookies on our website when you give your acceptance through the pop-up window shown on the home page when you enter the website. You may withdraw your consent by sending us your request via the contact information or the contact page.

## 6. HOW WE SHARE INFORMATION

The personal information of our customers and users is an important and fundamental part of our business. Under no circumstances will we sell or share information with third parties that has not been previously authorized by the user, client or owner of the personal data. We share user and customer information only and exclusively as described below.

**Third-Party Service Providers.** We employ other companies and individuals to perform functions on our behalf. Examples include: Hosting the website (GoDaddy), sending email, analyzing data (Google Analytics), create Ads (Facebook, Google), providing marketing assistance and providing search results.

These third-party services and tools may have access to personal information needed to perform their functions, but may not use that information for other purposes. Information shared with these third-party services will be treated and stored in accordance with their respective privacy policies and our privacy policy. Please refer to the privacy policy of these third-party services.

**Business Transfers.** In the event that Sparrow Imports creates, merges with, or is acquired by another entity or company, your information will likely be transferred. Sparrow Imports will send you an email or post a prominent notice on our platform before your information becomes subject to another privacy policy and the transfer and handling of your private information will comply with all applicable requirements.

**Protection of Sparrow Imports and others.** We release personal information when we believe release is appropriate to comply with the law, enforce or apply our Terms and conditions and other agreements, or protect the rights, property, or safety of Sparrow Imports, our users or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

**With Your Consent.** Other than as set out above, you will receive notice when personally identifiable information about you might go to third parties, and you will have an opportunity to choose not to share the information.

**Anonymous Information.** Sparrow Imports uses the anonymous browsing information collected automatically by our servers primarily to help us administer and improve the Website. We may also use aggregated anonymous information to provide information about the Website to potential business partners and other unaffiliated entities. This information is not personally identifiable.

**Email Address.** The email address that you supply to us for purposes of receiving our email communications will never be rented or sold to a third party.

## **7. PROTECTING YOUR INFORMATION**

Sparrow Imports will make all reasonable efforts to protect the personal information of users it obtains, and the personal information will be protected by dedicated data security personnel. In order to prevent users' personal information from being illegally accessed, copied, modified, transmitted, lost, destroyed, processed or used in unexpected and unauthorized situations, Sparrow Imports has and will continue to take the following measures to protect your personal information: 1) The user's personal information is encrypted and stored by adopting encryption technology, and is isolated by isolation technology. 2) When using personal information, such as personal information display and personal information association calculations, we will use a variety of data desensitization technologies including content replacement, encryption desensitization, etc. to enhance the security of personal information in use. 3) Establish a strict data use and access system, adopt strict data access authority control and multiple identity authentication technologies to protect personal information, and prevent data from being used in violation of regulations.

Other security measures taken to protect personal information 1) Manage and regulate the storage and use of personal information by establishing a data classification and grading system, data security management specifications, and data security development specifications. 2) Data security personnel are responsible for security emergency response to promote and protect personal information security. 3. Notification of personal information security incidents 1) In the event of a security incident caused by personal information, Sparrow Imports will report the first incident to the corresponding competent authority, and immediately carry out troubleshooting and emergency measures.

## **8. RIGHTS**

Users who provide information through our website, as data subjects and data owners, have the right to access, rectify, download or delete their information, as well as to restrict and object to certain processing of their information. While some of these rights apply generally, others apply only in certain limited circumstances. We describe these rights below:

- **Access and portability:** to access and know what information is stored in our servers, you can send us your request through our contact information.
- **Rectify, Restrict, Limit, Delete:** You can also rectify, restrict, limit or delete much of your information.
- **Right to be informed:** Users of our website will be informed, upon request, about what data we collect, how it is used, how long it is retained and whether it is shared with third parties.
- **Object:** When we process your information based on our legitimate interests as explained above, or in the public interest, you may object to this processing in certain circumstances. In such cases, we will stop processing your information unless we have compelling legitimate reasons to continue processing it or where it is necessary for legal reasons.
- **Revoke consent:** Where you have previously given your consent, such as to allow us to process and store your personal information, you have the right to revoke your consent to the processing and storage of your information at any time. For example, you may withdraw your consent by updating your settings. In certain cases, we may continue to process your information after you have withdrawn your consent if we have a legal basis for doing so or if your withdrawal of consent was limited to certain processing activities.
- **Complaint:** If you wish to file a complaint about our use of your information (and without prejudice to any other rights you may have), you have the right to do so with your local supervisory authority. Users can exercise all these rights by contacting us through the contact information or the contact page.
- **Rights related to automated decision-making, including profiling:** website users may request that we provide a copy of the automated processing activities we conduct if they believe that data is being unlawfully processed.

Users may exercise their rights in relation to the personal data they provide to Sparrow Imports, at any time, by sending us their request through our contact information and we will process and respond to their request as soon as possible.

## 9. CHILDREN'S ONLINE PRIVACY PROTECTION

We are in compliance with the requirements of the California Online Privacy Protection Act (CalOPPA – U.S regulation), regarding the protection of the personal data of minors. We do not collect any information from anyone under 13 years of age. Our website and services are all directed to people who are at least 13 years old or older. If you become aware that your child has provided us with personal information, please contact us. If we become aware that a child has provided us with personal information, we will take steps to delete that information, terminate that person's account, and restrict access to that person.

## 10. EDITING AND DELETING INFORMATION

If you believe that any information, we are holding on you is incorrect or incomplete, please write to or email us as soon as possible. We will promptly correct any information found to be incorrect. You can change, modify, rectify and delete your Information at any time, please

contact us through the contact information. To opt-out of Sparrow Imports email, follow the instructions included in the email. Your request should be processed within 48 hours.

## **11. THIRD PARTIES**

Except as otherwise expressly included in this Privacy Policy, this document addresses only the use and disclosure of information Sparrow Imports collects from you. If you disclose your information to others, whether other users or suppliers on Sparrow Imports, different rules may apply to their use or disclosure of the information you disclose to them. Sparrow Imports does not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable. Sparrow Imports is not responsible for the privacy or security practices of other websites on the Internet, even those linked to or from the “Sparrow Imports” website. Sparrow Imports encourages you to ask questions before you disclose your personal information to others.

## **12. CONTACT US**

If you have questions or concerns about these Privacy Policy and the handling and security of your data, please contact us through our contact page or via the contact information below:

**Sparrow Imports.**

**Sommer Walker- CEO**

[sommer@sparrowimports.com](mailto:sommer@sparrowimports.com)