

# *Regina McWhite*® Privacy Policy

Welcome to ReginaMcWhite.com. Please read our Privacy Policy carefully. This Privacy Policy applies when you visit and surf the United States section of ReginaMcWhite.com (the "ReginaMcWhite.com US Site") regardless of whether you purchase products or not, when you register with the ReginaMcWhite.com US Site, and when you use our services. By using the ReginaMcWhite.com US Site, you accept the practices described in this Privacy Policy. If you do not want to accept the practices described in this Privacy Policy, please do not use the ReginaMcWhite.com US Site.

The ReginaMcWhite.com US Site is operated under Regina McWhite Corporation, a Pennsylvania corporation having jurisdiction in the United States of America.

## OUR POLICY

Since personal data of users and customers of the ReginaMcWhite.com US Site may be processed in another country, any such processing of personal data will be conducted in compliance with applicable US law as well as the Foreign Data Protection Code (Legislative Decree no. 196 dated June 30, 2003). Pursuant to the United States Data Protection Code, RMc USA is the controller of personal data of users and customers of the ReginaMcWhite.com US Site. As controller of personal data, RMc USA independently determines the purposes and means by which your personal data are processed, including all security measures. Regina McWhite independently ensures that personal data are processed in another country in a correct and lawful manner and in accordance with good practice.

Everyone has the right to the protection of his/her personal data. Regina McWhite respect our users' right to be informed about the collection and processing of their personal data. The ReginaMcWhite.com US Site has been designed in such a way that the use of your personal data will be minimal and will not exceed the original purpose for which your personal data are collected and/or processed. In particular, we do not disclose your identity when the purpose for which your personal data are being processed can be achieved by using anonymous aggregate information. This Privacy Policy is intended to provide you with all the information you need in order to understand our privacy practices.

However, if you have any questions regarding our privacy practices and this Privacy Policy, please contact us at the following e-mail address: [privacy@store.ReginaMcWhite.com](mailto:privacy@store.ReginaMcWhite.com)

The ReginaMcWhite.com US Site is not directed at, nor do we knowingly collect personally identifiable information from children under the age of 13, although we may sell children's products or services for purchase by adults. If you are under 18, you may use the ReginaMcWhite.com US Site only with the involvement of a parent or guardian.

## WHO PROCESSES YOUR PERSONAL DATA?

For organizational and operational purposes only, Regina McWhite have appointed certain entities that will also process personal data of users and customers of the ReginaMcWhite.com US Site. Such purposes are strictly connected to the performance of services provided on the ReginaMcWhite.com US Site by Regina McWhite, including the sale of products. The above-mentioned data processors have been chosen by Regina McWhite because of their experience in processing personal data, their sufficient guarantees with respect to compliance with applicable laws and regulations, including The United States Data Protection Code (Legislative Decree no. 196 of 30 June 2003) as well as the technical security measures adopted by them in connection with the processing of personal data. In processing personal data of the users of the ReginaMcWhite.com US Site, our processors will act only in accordance with instructions provided by Regina McWhite. We regularly verify that our processors comply with our instructions and that they provide sufficient guarantees with respect to their compliance with applicable laws and regulations. The following is a list of the companies primarily involved in the processing of personal data of users and customers of the ReginaMcWhite.com US Site:

- United States Postal Service ([www.USPS.com](http://www.USPS.com)) We provide USPS, by electronic means, with customers' addresses and other personal data for the purpose of shipping, delivering and returning products purchased on the ReginaMcWhite.com US Site;

Please contact our Customer Service or send us an e-mail at [privacy@store.ReginaMcWhite.com](mailto:privacy@store.ReginaMcWhite.com) if you would like to receive a list of our data processors.

## HOW DO WE USE PERSONAL DATA AND FOR WHAT PURPOSE

Your personal data are collected and processed by Regina McWhite for purposes which are strictly connected to the use of the ReginaMcWhite.com US Site, its services and the purchase of products on the ReginaMcWhite.com US Site. However, your personal data may also be used for other processing operations within the limits of such purposes. In particular, your personal data may be processed for the following purposes:

- when you register with the ReginaMcWhite.com US Site we collect your personal data (for example, your personal information, e-mail address, gender) through the relevant registration form (My Account) in order to provide you with services in reserved access areas of the ReginaMcWhite.com US Site and in order to send you our Newsletter, when specifically requested;
- when you request customer care services, we collect your personal data (for example, your password) for purposes strictly necessary to provide you with customer care services relevant to the US Site and to the purchase of products on the US Site;
- when you request Customer Service assistance, we collect your personal data (for example, your first and last names, e-mail address and password) for purposes strictly necessary to provide you with Customer Service relevant to the ReginaMcWhite.com US Site and to the purchase of products on the ReginaMcWhite.com US Site;
- when you are executing purchasing procedures for products sold on the ReginaMcWhite.com US Site, including conclusion of an agreement for the purchase of products, we collect your personal data (for example, personal information, e-mail address, address, Credit Card numbers, bank account number and telephone number) on your order form only for the purpose of selling the products ordered by you;
- when you request technical assistance, we collect your personal data in order to provide you with information on netsurfing, Internet browsing or viewing and downloading web pages;
- when creating your Wish List, we process your personal data in order to customize our services for the purchase of products on the ReginaMcWhite.com US Site.

Your personal data are generally processed by electronic means; however, in certain circumstances, paper-based means may be used (for example, when the processing of your personal data is required for the prevention of fraud against us). Your personal data are stored in a way which allows Regina McWhite to identify you for the period that is strictly necessary for the original purposes for which such personal data are collected and subsequently processed, all in accordance with applicable laws.

Please report any changes to your personal data to the e-mail address [privacy@store.ReginaMcWhite.com](mailto:privacy@store.ReginaMcWhite.com) in order to ensure that your personal data are always accurate and kept up-to-date.

Your personal data will not be disclosed to third parties for purposes not permitted by law or without your explicit consent. Your personal data may only be disclosed to third parties when it is necessary to process an order placed by you. For example, your personal data are disclosed to Banca Sella S.p.A. for the performance electronic payment services, through Credit/Debit Cards. Moreover, your personal data may be disclosed to the police or to judicial authorities, in compliance with applicable laws and regulations and upon a formal request by such authorities for the purposes of preventing a fraud against us (anti-fraud services). Data processors will also have access to your personal data, as stated in Section 2 of this Privacy Policy, for the specific purposes stated in that Section. In all the above circumstances, your consent for data processing will not be specifically requested.

Your personal data will not be transferred to any countries outside the United States and Italy if such countries do not provide for an adequate level of protection of the privacy of individuals. Should the above be necessary in order to supply services to you or to execute contracts for the purchase of products, the transfer of your personal data to any such countries will be carried out only after the execution of specific contracts between Regina McWhite and all parties involved, in accordance with applicable laws and regulations.

We wish to inform you that Regina McWhite process users' personal data for purposes that are strictly connected to the supply of services through the ReginaMcWhite.com US Site, the execution of contracts related to the sale and purchase of products on the ReginaMcWhite.com US Site and, after receiving your consent, in order to send you information on new commercial initiatives which are strictly related to the ReginaMcWhite.com US Site's activities and services. Regina McWhite process your personal data for direct marketing purposes, including by e-mail, only after receiving your consent.

Regina McWhite may have access to third parties' personal data which is directly disclosed by their users to Regina McWhite, for instance when the user buys a product to be sent to a friend, when the user who pays the purchase price for a product is different from the recipient of such product, or when a user wishes to recommend to a friend a service provided through the ReginaMcWhite.com US Site or the sale of a particular product posted on the ReginaMcWhite.com US Site.

In all cases involving the disclosure of information of a third party, you must obtain the consent of such individuals before disclosing their personal data to Regina McWhite and have informed said individuals about this Privacy Policy. You will be the only person liable in connection with the disclosure of information and data relevant to such third parties and with any other incompatible and unlawful use of such data if they have not provided you with their consent. You agree to indemnify, defend and hold Regina McWhite harmless from any liability, claims and expenses, including reasonable attorneys' fees, arising from or related to any unauthorized disclosure of personally identifiable information of third parties.

## WHAT HAPPENS IF YOU DO NOT DISCLOSE YOUR PERSONAL DATA?

The personal data we request you to provide to Regina McWhite, including your e-mail address, your address, your Credit/Debit Card numbers, bank account number and your telephone number, is necessary for the processing of your order for the purchase of products on the ReginaMcWhite.com US Site, to supply other services provided on the ReginaMcWhite.com US Site upon your request, or to carry out obligations arising out of applicable laws and regulations.

Your refusal to provide certain personal data to Regina McWhite may prevent Regina McWhite from processing your order for the purchase of products sold on the ReginaMcWhite.com US Site or from providing other services through the ReginaMcWhite.com US Site, such as Customer Services, sending the Newsletter, use of the Wish List, recommending a product to a friend.

Your failure to provide personal data to Regina McWhite may prevent the processing of your order for the purchase of products sold or to provide services through the ReginaMcWhite.com US Site.

The disclosure of personal data to Regina McWhite other than that required in order to fulfill legal or contractual obligations or to provide the services requested by you is optional and does not have any effect on the use of the ReginaMcWhite.com US Site and its services or on the purchase of products on the ReginaMcWhite.com US Site. We will inform you if the personal data we ask you to provide is necessary or optional by marking with an asterisk (\*) the information that is necessary. Your failure to disclose optional personal data will not pose any obligation or disadvantage to you, except to the extent that we may not be able to offer you some of our optional, personalized features of the ReginaMcWhite.com US Site.

## TO WHOM YOUR PERSONAL DATA WILL BE DISCLOSED?

Your personal data may be disclosed to third parties who provide specific services as Data Processors on behalf of Regina McWhite or who autonomously process personal data collected by Regina McWhite in connection with the performance of a contract for the purchase of products on the ReginaMcWhite.com US Site

Any such disclosure will be conducted, in each instance, without exceeding the original purposes for which your personal data were collected and subsequently processed. In addition, your personal data may be disclosed to third parties in order to (1) comply with applicable laws, (2) respond to governmental and judiciary inquiries, (3) comply with valid legal process, and (4) protect the rights or property of Regina McWhite.

Any third party information disclosed to d Regina McWhite in accordance with this Privacy Policy will not be used for any purpose other than as required to technically operate the service, to complete a transaction, or as otherwise required by law.

In the event there is a change in the corporate structure of Regina McWhite including, without limitation, by merger, consolidation, sale, liquidation, or transfer of substantial assets, Regina McWhite may, in their sole discretion, transfer, sell or assign personal data collected on and through the ReginaMcWhite.com US Site, including, without limitation, personally identifiable information and aggregate information concerning users and customers, to one or more affiliated or unaffiliated third parties.

In any event, your personal data will not be disclosed to Third Parties without you being informed or without your consent, when such consent is required by law.

## HOW DO WE COLLECT YOUR DATA ON REGINAMCWHITE.COM?

### Cookies

When you are using the ReginaMcWhite.com US Site, some personal data may be collected automatically through so-called "cookies". A cookie is a device transmitted to the hard drive of an Internet user. While cookies do not contain intelligible information, they allow us to link an Internet user to personal information provided by such user through the ReginaMcWhite.com US Site. Regina McWhite process information collected by cookies in a collective and anonymous way, in order to optimize our services and the ReginaMcWhite.com US Site for the needs and preferences of its users. We use cookies to collect users' IP addresses and other information regarding users' data traffic or preferences in the choice of services provided and products purchased through the ReginaMcWhite.com US Site.

We disseminate cookies in connection with functions such as browsing the catalogue, purchasing products on-line and supplying "My Account" services.

As you may know, each Internet browser allows the deletion of cookies after each session. Your Internet browser contains instructions on how to carry out these procedures of deletion. Please access the appropriate instructions section on your Internet browser if you wish to delete cookies.

Your acceptance of our automatic procedures of collection of data and the use of cookies is necessary to take advantage of many features and services offered by the ReginaMcWhite.com US Site, including the purchase of products. If you set your browser to block or delete cookies, we cannot guarantee that you will have access to all the features and services offered by the US Site (for example, your computer may not be able to display the image of the product you are in the process of purchasing).

### Other Methods of Collecting User Information.

Regina McWhite directly collect personal data and information from users when they register on-line with the ReginaMcWhite.com US Site or when they send purchase orders for products sold on the ReginaMcWhite.com US Site in order to finalize their transactions.

## SECURITY MEASURES

We have adopted security measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access and against other unlawful forms of data processing, as provided in our Privacy Policy. Nevertheless, Regina McWhite cannot guarantee that the security measures adopted for the protection of the ReginaMcWhite.com US Site and the transmission of data and information through the ReginaMcWhite.com US Site will prevent or exclude any risk of unauthorized access to or loss of data. It is advisable that your computer be equipped with software devices for the protection of network data transmission and receipt (such as, updated antivirus systems) and that your Internet service provider take appropriate measures for the security of network data transmission (such as, firewalls and anti-spam filtering).

## OPT-IN/OPT-OUT

Advertising material and direct marketing or other commercial communications which are not specifically requested by you or necessary to provide a service you requested, including the purchase of products on the US Site, will be sent to you only after we receive your consent. Please note that each time your consent is required, we will inform you in advance and we will give you the option to either provide or refuse your consent by selecting the appropriate box.

Regina McWhite may process your personal data without your consent when such processing is necessary to comply with applicable laws and regulations or to provide you with services you requested, including the purchase of products on the US Site.

Even when your prior consent is not necessary, you may exercise, at any time, your right not to receive future communications regarding services you requested, such as the Newsletter.

## YOUR RIGHT TO ACCESS PERSONAL DATA & FURTHER RIGHTS

You are entitled to obtain, at any time, confirmation from Regina McWhite as to whether or not data relating to you is being processed, even if not yet registered, and the communication of any such data in an intelligible form.

Moreover, you are entitled to receive from Regina McWhite information on the source from which we received your personal data; the purposes and means of processing your personal data; the logic involved in any electronic data processing; information regarding the data controller and the data processors and the names of subjects and categories of subjects to whom your personal data may be disclosed or who may access your personal data (for example, the names of data processors). You can also find the above information in our Privacy Policy.

You are entitled to obtain at any time from Regina McWhite:

- a. the updating, rectification or integration of your personal data;
- b. the deletion, transformation into anonymous form or blocking of your personal data, which are processed in violation of the law, including when the storage of data is not necessary for the purposes for which it has been collected and subsequently processed;
- c. the confirmation that the operations under letters a) and b) have been reported to whom the data were disclosed or disseminated, except when it becomes impossible to do so or if it means exceeding the protection of the right you are claiming.

You are entitled to object, in all or in part:

- a. for legitimate reasons, to the processing of your personal data, even if it is related to the purposes for which it was collected;
- b. to the processing of your personal data for advertising or direct marketing purposes or in order to carry out marketing research or commercial communications.

You may freely and at any time exercise your rights, provided that you do so in compliance with applicable laws and regulations, by sending your request to Regina McWhite at the following e-mail address: [privacy@ReginaMcWhite.com](mailto:privacy@ReginaMcWhite.com)

## LINKS TO OTHER WEB SITES

The ReginaMcWhite.com US Site may provide hyperlinks to third party websites (the "Third Party Websites"). Regina McWhite do not operate, control, endorse or guarantee any Third-Party Websites. You agree that Regina McWhite are not responsible for any content, services and/or products provided by any Third-Party Website, nor are Regina McWhite responsible for any practice followed by such Third-Party Website with respect to the collection and processing of personal data of their users. When you access any Third-Party Website through a hyperlink posted on the ReginaMcWhite.com US Site, please carefully read the Privacy Policy and other policies of such Third-Party Website. Our Privacy Policy and other policies do not apply to any Third-Party Website. Regina McWhite provide hyperlinks to Third Party Websites only for the convenience of our users. By providing hyperlinks to Third Party Websites, Regina McWhite do not recommend that users access such Third Party Websites.

YOU AGREE THAT YOUR USE OF ANY THIRD PARTY WEBSITE IS AT YOUR SOLE RISK AND WITHOUT WARRANTIES OF

## *Regina McWhite*® Privacy Policy

ANY KIND BY Regina McWhite, EXPRESSED, IMPLIED OR OTHERWISE, INCLUDING, BOT NOT LIMITED TO, WARRANTIES OF TITLE, FITNESS FOR A PARTICULAR PURPOSE, MERCHANTABILITY OR NONINFRINGEMENT. UNDER NO CIRCUMSTANCES ARE Regina McWhite LIABLE FOR DAMAGES ARISING FROM ANY TRANSACTION BETWEEN YOU AND ANY THIRD-PARTY WEBSITE OR FOR ANY INFORMATION APPEARING ON THIRD PARTY WEBSITES.

CERTAIN STATE LAWS DO NOT ALLOW LIMITATIONS ON IMPLIED WARRANTIES OR THE EXCLUSION OR LIMITATION OF CERTAIN DAMAGES. IF THESE LAWS APPLY TO YOU, SOME OR ALL OF THE ABOVE DISCLAIMERS, EXCLUSIONS, OR LIMITATIONS MAY NOT APPLY TO YOU, AND YOU MIGHT HAVE ADDITIONAL RIGHTS.

## CONTACTS

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If you wish to receive further information regarding our privacy practices, please contact us at the following e-mail address: [privacy@ReginaMcWhite.com](mailto:privacy@ReginaMcWhite.com).

## GOVERNING LAW

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The processing of personal data by Regina McWhite will be conducted in compliance with applicable US laws. The laws of Italy, including The United States Personal Data Protection Code (Legislative Decree no. 196 dated June 30, 2003), also apply to the processing of personal data carried out by Regina McWhite. The United States Personal Data Protection Code guarantees that the processing of your personal data will be carried out in compliance with the fundamental rights and freedoms of individuals and their dignity, with particular reference to confidentiality, identity and the right to personal data protection.

## MODIFICATION & UPDATING

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Regina McWhite may amend or update from time to time all or any part of this Privacy Policy, whether or not required by a change in the applicable laws and regulation. Our users will be notified of any amendment to or update of our Privacy Policy on our homepage. All amendments and updates will become effective upon publication on this section of the ReginaMcWhite.com US Site. You should regularly access this section of the ReginaMcWhite.com US Site in order to review the most recent and updated version of our Privacy Policy.