

Privacy Policy

This Privacy Policy describes the privacy practices of the Celebration Wishes Site (as defined below) operated by Celebration Wishes, Inc., a California corporation (collectively, “Celebration Wishes” or “we” or “us” or “our”), the Personal Data we collect about you, how we collect it, how we use it and with whom we share it. Please read this notice carefully to understand our policies and practices for processing and storing your Personal Data when you use the services we provide on our Site (“Services”) and the choices you can make about how we collect and use your Personal Data. This Privacy Policy applies to the Personal Data that we collect from users of both the full and mobile versions of our website www.celebrationwishes.com and our mobile application (together, the “Celebration Wishes Site” or “Site”).

By accessing and utilizing our Services, you expressly consent to our collection and use and disclosure of your Personal Data in the manner described in this Privacy Policy. If you object to your Personal Data being transferred or used as described in this Privacy Policy, please do not send or upload any information to us or use our Site or Services. This Privacy Policy may change from time to time, and your continued access and/or use of our Services after any such revisions indicates that you accept and consent to them. Please check periodically for updates.

1. DEFINITIONS

- **Cookies.** Cookies are small pieces of data stored on your device (computer or mobile device).
- **Data Controller.** Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any Personal Data are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.
- **Service Providers (or Data Processors).** Service Providers (or Data Processors) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the service of various Service Providers in order to process your data more effectively.
- **Data Subject (or User).** Data Subject is any living individual who is using our Website and is the subject of Personal Data. For the purpose of this Privacy Policy, you are a Data Subject.
- **Personal Data.** Personal Data means information about a living individual who can be identified from such information (or from those and other information either in our possession or likely to come into our possession), as more fully described in Section 2 below. It does not include information where the identity has been removed or is not able to be associated with an individual.

2. THE DATA WE COLLECT ABOUT YOU

We collect several different types of Personal Data from you depending on how you interact with our Services. Depending on how you interact with our Site and use our Services, the Personal Data we collect may vary. Most of the information we collect is given to us by you directly when you use our Services. Occasionally, we collect information from your device which helps us better provide our services to you.

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- Identity Data includes first name, last name, username or similar identifier, marital status, title, and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Profile Data includes your username and password, purchases made by you, your preferences.
- App Log and Usage Data. For example, app launches, taps, clicks, scrolling information, and other information about your interaction with our App(s).
- Usage Data includes information about how you use our website, products, and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your Personal Data but is not considered Personal Data in law, as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your Personal Data so that it can directly or indirectly identify you, we treat the

combined data as Personal Data which will be used in accordance with this Privacy Policy.

If You Fail To Provide Personal Data

Where we need to collect Personal Data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW WE COLLECT YOUR PERSONAL DATA

We collect your Personal Data directly and indirectly from you. Your direct information is provided when we ask you for it and you provide it to us, like when you create an account, set up and build a registry, post information, send us an email or call us, or make a payment. In addition, as you interact with our Site, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using Cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our Cookies. Please see our Cookie Policy for further details.

Data We Collect From Third Parties

We may receive Personal Data about you from various third parties, as follows:

- We receive Technical Data from analytics providers (e.g., Google Analytics).
- We receive Technical Data from advertisers.
- We receive Transaction Data from providers of payment services.

4. HOW WE SHARE YOUR PERSONAL DATA.

From time to time, we may share your Personal Data with others, including in the following circumstances.

Experience Providers. We share Personal Data with the providers of our experiences, including travel and destination providers, travel agents, cruise lines, resorts, and other similar partners. We do this to provide your and other individuals' information to the relevant parties in your registry, and in connection with your destination and experience choices.

Public Disclosures on Celebration Wishes. Some of your Personal Data will be shared with the general public, including the information posted on your registry website. When

information is made publicly available it may be accessed by anyone with access to the platform to which the information is posted. It may also be indexed by third-party search engines, and be imported, exported, distributed, aggregated, and redistributed by others without our knowledge.

Service Providers. We may share your Personal Data with Service Providers who perform various functions to enable us to provide our Services and help us operate our business, such as website design, sending email communications, fraud detection and prevention, customer care, payment processing, or performing analytics. When we transfer Personal Data to our Service Providers, we will: (i) transfer such Personal Data only for the limited and specified purposes consistent with the request or consent you provide; (ii) contractually require the Service Providers to maintain the confidentiality of the Personal Data we provide to them, only act on our behalf and under our instructions, and not use Personal Data for purposes other than the product or service they're providing to us or on our behalf; (iii) require the Service Providers to notify us if it makes a determination that it can no longer meet its obligation to provide the same level of protection as is required by this Privacy Policy. Should we receive any such notice, we will take reasonable and appropriate steps to stop and remediate unauthorized processing. We shall remain liable should our Service Providers process Personal Data in a manner inconsistent with this Privacy Policy, unless we can prove we are not responsible for the event giving rise to the damage. We acknowledge our liability for such data transfers to third parties in violation of this Privacy Policy.

With our Affiliates and Partners. When participating in events or activities that we offer along with our partners and/or affiliates, you may be asked to share Personal Data with those affiliates and/or partners. In such a situation, if you consent to such disclosure, the information we obtain from you may be shared with our affiliates participating in such event or activity. In some instances, we may act as joint Data Controllers of your Personal Data, depending on the circumstances. For example, when one of our affiliates creates a private label registry, we may share information that we collect through the Site with them in order to facilitate the provision of Services, provide them with relevant information regarding your use of our Services.

With Data Controllers. In some cases, we may transfer Personal Data to unaffiliated third-party Data Controllers. These third parties do not act as agents or Service Providers and are not performing functions on our behalf. We require third-party Data Controllers to whom we disclose your Personal Data to contractually agree to (i) only process such Personal Data for the limited and specified purposes consistent with the consent you provide; and (ii) provide the same level of protection to your Personal Data as required under this Privacy Policy; and (iii) notify us if the third-party Data Controller makes a determination that it can no longer meet the foregoing obligations.

Protection of Celebration Wishes and Others. We may share Personal Data when we believe it is appropriate to enforce or apply our Terms of Service and other agreements;

or protect the rights, property, or safety of Celebration Wishes, our products and services, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and risk reduction. This does not include selling, renting, sharing, or otherwise disclosing Personal Data of our customers for commercial purposes in violation of the commitments set forth in this Privacy Policy.

Response to Subpoenas and Other Legal Requests. We may share your information with courts, law enforcement agencies, or other government bodies when we have a good faith belief we're required or permitted to do so by law, including to meet national security or law enforcement requirements, to protect our company, or to respond to a court order, subpoena, search warrant, or other law enforcement request.

Sale of Our Business. If we sell, merge, or transfer any part of our business, your Personal Data would be transferred along with the other business assets as permitted by law. If so, you will be asked if you'd like to stop receiving promotional information following any change of control.

With your Consent. Other than as set out above, we will provide you with notice and the opportunity to choose when your Personal Data may be shared with other third parties.

5. HOW WE USE YOUR PERSONAL DATA.

We will only use your Personal Data when allowed by law. Generally, we will use your Personal Data: (a) where we need to perform the contract we are about to enter into or have entered into with you; (b) where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests; and (c) where we need to comply with a legal or regulatory obligation.

Purposes for which we will use your Personal Data

Below is a chart of some of the common ways in which we process your Personal Data. We have identified what our legitimate interests are where appropriate. Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data (varies depending on circumstances)	Lawful basis for processing including basis of legitimate interest

To register you as a user of our Services.	Profile Data	Our legitimate interests in website security and customer service.
Creating a Couple's Registry	Identity Data Contact Data Financial Data Transaction Data Usage Data	Performance of a contract with you.
Notifying you about changes to our terms or Privacy Policy	Contact Information	Necessary to comply with a legal obligation.
Providing Gifts to a Couple	Contact Data Transaction Data Financial Data	Performance of a contract with you. Legitimate Interests (to learn how our users use our Services, to improve our Services, to grow our business).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Technical Data Transaction Data Usage Data Profile Data	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)

To provide you with information and marketing communications about our products and services.	Marketing and Communications Data	Consent Legitimate Interests (in marketing goods or services in which you may have a personal interest based on our ongoing business relationship).
To provide you with third party offers that may be relevant to you.	Marketing and Communications Data	Consent
To respond to customer service requests including order status and chat communications.	Identity Data Contact Data Usage Data Transaction Data	Legitimate Interest (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) Consent

6. MARKETING AND ADVERTISING PRACTICES

Interest Based Advertising. Celebration Wishes uses advertising to help fund our Services and we utilize advertising technology providers to help deliver relevant advertising to you. Celebration Wishes and the technology provider may collect, receive, or use your Personal Data in connection with your use of the Services in order to provide interest-based advertising to you. In such cases the advertiser is acting as a Data Controller of the data for its own purposes.

Most of the third-party advertising and data companies we work with subscribe to the Digital Advertising Alliance Principles and/or are members of the Network Advertising Initiative (“NAI”). To learn more about the information collection practices of NAI members and your related opt-out choices, please visit the NAI’s website here. For more

on EU online choices, please visit the EU online choices website here. You can opt out of interest-based advertising from Google by visiting the About Google Ads page or opt out of the DoubleClick cookie by installing the DoubleClick opt out extension. For information about how Google uses data from DoubleClick for Publishers, click here.

Please refer to the privacy policies of our advertising partners for more information on how to exercise your rights and control your advertising choices. Our advertisers include the following:

Mobile App Advertising and Tracking. Celebration Wishes, our authorized Service Providers and/or other third-party partners (listed above) involved in the delivery of advertising you receive through our app may collect information about your mobile device, including your mobile device's advertising identifiers and the names and IDs of apps you have installed, as well as information about how you use our mobile applications and other unaffiliated applications. We and our partners use this information to enable interest-based advertising you receive through our Services and within third-party apps and other marketing channels. Depending on your device and operating system, you may be able to reset your mobile device's advertising identifier to limit this data collection or prevent the collection of usage data across unaffiliated applications for interest-based advertising purposes by accessing the privacy settings on your mobile device. Each operating system, iOS for Apple devices, Android for Android devices and Windows for Microsoft devices, provides its own instructions. Visit the privacy settings for your mobile device for more information.

In addition, you may see our services advertised in other services. After clicking on one of these advertisements and installing our app, you will become a user of our Service. In order to verify the installs, a device identifier may be shared with the advertiser.

Social Media Advertising. Celebration Wishes also runs other kinds of online ad campaigns on social networking websites and other non-Celebration Wishes websites and apps. Some of these ads may be based on information we have about users. If Celebration Wishes provides information to a website or app for these advertising purposes, the information may only be used to display the Celebration Wishes ad. Please see the privacy policy of the website or app where a Celebration Wishes ad is shown for more information about its privacy practices and privacy choices it may offer.

7. THIRD PARTY LINKS

The platforms on which our Services run may include links to third-party services, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party services and are not responsible for their privacy statements. When you leave our website, we encourage you to read the Privacy Policy of every other website or app you visit.

8. DATA SECURITY

The security of your data is important to use, but remember that no method of transmission over the internet, or method of electronic storage is 100% secure. We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. We strive to use commercially acceptable means to protect your Personal Data, but we cannot guarantee its absolute security. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. Please note that despite our best efforts, no one can guarantee the security of Personal Data. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of Personal Data at any time.

9. DATA RETENTION

We will retain your Personal Data only for so long as necessary to fulfil the purposes for which we collected it, including for the purposes of performing a contract with you, complying with our legal obligations (for example, if we are required to retain your Personal Data to comply with applicable laws), resolving disputes, and enforcing our legal agreements and policies. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data; the potential risk of harm from unauthorized use or disclosure of your Personal Data; the purposes for which we process your Personal Data and whether we can achieve those purposes through other means; and the applicable legal requirements. In some circumstances we may anonymize your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. INTERNATIONAL DATA TRANSFERS

Celebration Wishes has its headquarters in the United States, and the information we collect will be processed in the United States. The United States has not sought nor received a finding of “adequacy” from the European Union under Article 45 of the GDPR. Where we transfer EU data subject’s Personal Data to third parties outside of the European Economic Area (EEA), we rely on appropriate suitable safeguards or specific derogations recognized under data protections law, including the GDPR. The European Commission has adopted standard data protection clauses, which provide safeguards for Personal Data transferred outside of the EEA. We may use Standard Contractual Clauses when transferring Personal Data from a country in the EEA to a country outside the EEA whenever appropriate.

11. CHILDREN'S PRIVACY

We are committed to complying with the laws protecting the privacy of children, including the United States' Children's Online Privacy Protection Act (COPPA). Our Services are not directed to children under the age of 16. We do not knowingly collect Personal Data from children under the age of 16. If we receive Personal Data that we discover was provided by a child under the age of 16, we will promptly destroy such information. If you would like to learn more about COPPA, please visit the Federal Trade Commission home page at <https://www.ftc.gov>.

12. EUROPEAN UNION DATA SUBJECT RIGHTS

EU Data Subjects have certain rights with respect to Personal Data that we collect and process. We respond to all requests we receive from individuals in the EEA wishing to exercise their data protection rights in accordance with applicable data protection laws.

- Access, Correction or Deletion. You may request access to, correction of, or deletion of your Personal Data. You can often go directly into the Service under Account Settings to take these actions. Please note that even if you request for your Personal Data to be deleted, certain aspects may be retained for us to: meet our legal or regulatory compliance (e.g. maintaining records of transactions you have made with us); exercise, establish or defend legal claims; and to protect against fraudulent or abusive activity on our Service. Data retained for these purposes will be handled as described in Section 9 "Data Retention", above.
- Objection. You may object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Restriction. You have the right to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Portability. You have the right to request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your

Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Withdraw Consent. If we have collected and processed your Personal Data with your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Data conducted in reliance on lawful processing grounds other than consent.
- File a complaint. You have the right to file a complaint with a supervisory authority about our collection and processing of your Personal Data.

To file a request or take action on one of your rights, please contact us at the contact details provided. You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and verify your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person with no right to receive it. We may also contact you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

PRIVACY POLICY TERMS APPLICABLE TO SPECIFIC STATES

1. California

Please see our California Privacy Policy which supplements this Privacy Policy.

2. U.S. State-Specific Privacy Rights

Residents of certain U.S. States have the rights indicated below as of the date in which the applicable laws granting such rights are effective, which are as follows:

California: January 1, 2023

Virginia: January 1, 2023

Colorado: July 1, 2023

Connecticut: July 1, 2023

Utah: December 31, 2023

Privacy Rights	Description	CA	VA	CO	CT	UT
Access/Know	Request confirmation from us as to whether your Personal Data is being processed by us and, if so, access to such Personal Data.	X	X	X	X	X
Deletion	Request that your Personal Data be deleted (subject to some limitations)	X	X	X	X	X
Portability	Request that we provide a copy of the Personal Data that you have provided to us in a usable/readable format	X	X	X	X	X
Rectification/Correction	Request that we correct any inaccurate Personal Data relating to you (subject to limitations)	X	X	X	X	
Restriction on Sharing for Cross-Context Behavioral or Targeted Advertising (called “sharing” under California law)	Request that we stop sharing of your Personal Data for purposes cross-contextual behavioral of targeted			X	X	X

	advertising purposes					
Sales of Personal Data	Request that we stop selling Personal Data about you to third parties			X	X	X
Restriction on Automated Decision-Making or Profiling	Request that we stop using automated decision-making technology to evaluate you, create a profile of you, and make predictions about your future behavior.			X	X	X
Limiting the Use and Disclosure of Sensitive Personal Data	Request that we limit our use and disclosure of your “sensitive personal information,” as that term is defined in the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (CCPA), to the extent required by law.	X				
Right to Appeal	Appeal the denial of a privacy rights request under the relevant law		X	X	X	

We do not engage in automated decision making/profiling so no action is required to exercise this right under state law.

You may make a request at any time to exercise your privacy rights under applicable law by using our Privacy Portal/WebForm. We will respond to your request in the time permitted by law (if properly submitted). If we need more time to process and respond to your request, we will notify you of that fact along with the reason for the delay. In all cases we will complete your request within the time permitted by law. If we decline to act regarding your request, we will inform you of our decision and the reason for it.

Nevada

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You may submit a request using by emailing us at service@celebrationwishes.com.

13. CHANGES TO OUR PRIVACY POLICY

By using this Site, you agree to the terms and conditions contained in this Privacy Policy and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use this Site. You agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the laws of the State of California. You also agree to arbitrate such disputes in California, and to abide by any limitation on damages contained in any agreement we may have with you.

This Policy is expected to change from time to time. We reserve the right to amend this Privacy Policy at any time and provide notice to you by posting of the amended Privacy Policy on the website. We may also email you to give you notice of material changes to this Privacy Policy. The provisions contained herein supersede all previous notices or statements regarding our privacy practices and the terms and conditions that govern the use of this Services.

14. HOW TO CONTACT US

If you have any questions or wish to register a complaint in relation to this Privacy Policy or the manner in which your Personal Data is used by us, please contact us by any of the following means:

Celebration Wishes Inc,
627 8th Avenue
San Diego, CA 92101
service@celebrationwishes.com
Phone: (800) 801-3493
Fax: (858) 433-0500