

# Pivot Interiors Privacy Policy

**Last Updated: May 12, 2023**

Pivot Interiors, Inc. ("Pivot", "us," "we," "our," or "Company") has created this Privacy Policy to disclose how we collect, use, share, and protect information about you, as well as to inform you of privacy rights you may have and how to exercise them. Pivot is an interior design company that furnishes solutions for businesses. This Privacy Policy applies to individuals who interact with Pivot through our offices, websites, products, and services (collectively, our "Services") except as described below. Pivot values the privacy of our customers' information and we are always striving to make our customer experience better. If you have any questions about this Privacy Policy or our information practices, please contact us through the options provided below.

## Acknowledgment

By using our Services, you consent to the information practices and other terms as described in this privacy policy. You should read this privacy policy carefully. We may update this policy from time to time, and we will provide notice of changes we make if we believe it is necessary or required by law. We encourage you to periodically review this privacy policy for changes. Your continued use of our Services constitutes acceptance of any such changes we make to this Policy from time to time.

## Scope

This Privacy Policy applies to the personal information of users of our Services except as described here. This Privacy Policy does not apply to information collected by or provided in connection with an individual's current or former employment or independent contractor arrangement with Pivot. If you are a Pivot employee, independent contractor, or applicant for employment, please contact us for information on how Pivot collects, uses, processes, discloses, shares, and retains applicant and employment information not covered by this policy.

This Privacy Policy does not apply to the practices of third parties that we do not own or control, even if you access a third-party site from our website(s) and/or application(s) (collectively, our "Website"). We have no control over or responsibility regarding the information collected from you by others. Instead, such information practices are governed by those entities' privacy policies. Please review the privacy policies of any third-party websites for information on how those entities collect and use your information.

## Personal Information We Collect

Personal information means any information that identifies, relates to, describes, or could be reasonably associated or linked with a particular person or household. It also includes other information that may be associated with you, such as your usage data, location, preferences, or interests, if that information can be used to identify you, your household, or your device. Personal information does not include publicly available information from government records or deidentified or aggregated information.

The personal information we collect about you depends on your interaction with us. Pivot may collect the following types of information from you and other users of our Website or Services:

Category	Information We Collect
Identifiers.	Your name and contact information such as mailing address, phone number, and email address.
Payment and transactional information.	Your payment and transactional information including debit and credit card numbers for Services purchased. For any direct purchasing activity, we use third party payment processors to facilitate payments and do not store payment information.

D. Commercial information.	Records of products or Services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
F. Internet, usage and technical information.	IP addresses, Website pages viewed and duration, browser and operating system information, mobile device type, system settings, and other data related to your interaction with our Website.
G. Geolocation information.	Physical location data of device used based on IP address.

We also collect your communications with us, preferences, and other information you provide to us, including any messages, opinions, feedback, your user preferences (such as in receiving updates or marketing information), and other information that you share with us when you contact us directly (such as for customer support services).

**Sensitive Personal Information.** Our Website automatically collects certain information that may be used to geolocate user devices by IP address. Pivot only collects this Sensitive Personal Information without the purpose of inferring characteristics about individuals.

**Cookies.** Our Website uses cookies to track which areas of our Website are used the most and to help us make our Website more informative and user-friendly. Cookies are small data files stored by your web browser on your computer's hard drive. Pivot may receive, store and use the information you enter on our Website or which is collected during your visit to our Services. Such information will generally not personally identify you and may include the date and time of your visit, pages accessed, the web browser you use, the internet address of any website from which you linked directly to our Website and related information.

Some of the cookies we use are “strictly necessary” for the functionality of our Website. Others improve the functionality of our Website but are not strictly necessary. Some cookies help improve the performance of our Website such as by gathering analytic data.

Our Website uses the following types of tracking technologies:

- **Session Cookies:** Session cookies are stored only temporarily during a browsing session in order to allow normal use of the system and are deleted from your device when the browser is closed.
- **Persistent Cookies:** Persistent cookies are saved on your computer for a fixed period and are not deleted when the browser is closed. Such cookies are used where we need to know who you are for repeat visits, for example to allow us to store your preferences for the next session.
- **Third Party Cookies:** Third party cookies, which are set by other online services who run content on the page you are viewing, for example by third party analytics companies who monitor and analyze our user experience.
- **Pixel Tags:** Pixel tags and similar tracking technologies are tiny graphic images placed on website pages or in our emails that allow us to determine whether you have performed a specific action. These tools allow us to measure response to our communications and improve our web pages. Pivot and its third-party service providers may also use technology including pixels, for other purposes including web site management and customization.

See **Your Cookie Choices** below for information on settings you can elect to limit the use of cookies on your devices.

## How We Collect Your Information

Pivot collects information in the following ways:

- **Information You Provide To Us:** We collect information that you decide to share with us. For example, we collect personal information directly from you when you engage with our Services through our Website, sign up for our mailing list, contact us via email or a form on our Website, engage with us on social media, or otherwise interact with us or use our Services. At times, we may require you to provide certain information, including personal information, in order to provide you with Services you request. We may require you to provide your name, email address, or other contact information when you contact us with a question or comment. In some circumstances, we will not be able to further our relationship with you (for example, to provide you with our Services if you are a customer or engage you if you are a potential supplier) without certain personal information.
- **Information We Obtain Automatically When You Use of Our Services or Website:** We collect certain personal information from you when you access our Website and Services, such as information about your internet activity including IP address, operating system, and browser type. We may also collect information about your usage of our Services, such as details of your visits to our Website and the resources that you access and use on the Website. In addition, we may collect information through the use of cookies, pixel tags, or other technologies, as described above.
- **Information We Obtain from Other Sources:** We may also obtain information about you from other sources, such as those that help us provide our Services to you. We may obtain public information from sources like the press, public websites, social networking sites, or other databases of public information.

## How We Use Your Information

We generally use your information for the following purposes:

- To provide our Services, including to answer any questions or inquiries you make to us, perform a contract with our clients or service providers, and provide customer support to you.
- To market our Services, including to contact you directly with news about us and our Services, special offers, and other information we believe may be of interest to you if you have agreed to receive such communications.
- For operational purposes related to our Website, including debugging and repairing errors that impair the functionality of our Website, and detecting security incident and improving the security of our network.
- To satisfy your requests and preferences. For example, if you make a request through our website that we contact you, we will use the information you provide to evaluate your specific request and contact you.
- To confirm your eligibility to use the Services.
- To improve the Website's content and features.
- To monitor and analyze user behavior and activity on or through the Website in order to keep the Website secure and to enhance your user experience.
- To comply with applicable laws, in response to a lawful and enforceable request by a law enforcement, judicial, or other public authority, or in connection with an applicable legal obligation.
- To assist with fraud prevention, report suspected criminal activity to law enforcement, or to help prosecute individuals responsible for malicious, deceptive, fraudulent, or illegal activity.

- Where you otherwise have given Pivot your consent and permission to do so.

## How We Share Information We Collect

We do not sell your personal information including sensitive personal information to third parties. We do not share personal information for cross context behavioral advertising.

However, we may disclose your personal information to third parties to help provide our Services to you. For instance, we may disclose your information to our service providers to respond to your requests or to provide customer service. We may also provide your personal information to third parties who assist us in providing certain services. For example, we may provide the information we collect from you to our cloud hosting service providers, or our payment card processing providers.

We may also disclose your information for the following purposes:

- To facilitate and improve the quality and marketing of our Services.
- To protect our users and network against fraud and security threats.
- To comply with a legal obligation.
- To protect and defend our rights or property.
- To prevent or investigate possible wrongdoing in connection with the Services.
- To protect against legal liability.
- When there is a good faith belief that such action is necessary to investigate or protect against harmful activities to our guests, visitors, associates, or property (including the Websites), or to others. This may include disclosures to law enforcement to investigate potential criminal activity or other civil violations.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Pivot's assets.
- For other purposes, with your consent.

We may disclose your information to the following types of entities and third parties:

- **General Service Providers:** We employ third-party service providers, companies, individuals, and agents to facilitate and help us provide our Services to you. Such service providers perform tasks or functions on our behalf, provide Services-related services, or assist us in analyzing how our Services are used or delivered. For example, we may disclose information to our database and cloud storage providers that help us maintain our Websites and other systems.
- **Analytics Service Providers:** We use third-party analytics service providers to assist us in collecting and understanding website usage information. We use information from these services to help us improve our Website and the Services we provide to our users. Your personal information may be automatically collected on our Website and disclosed to analytics providers.
  - Google Analytics. We use Google Analytics with Restricted Data Processing enabled, and data sharing with Google products and services disabled. Google is granted access to your information only to provide analytics on traffic through our website as a service provider and Google is not authorized to use your information for any other purpose, including

targeted advertising. You can opt out of having your activity made available to Google Analytics by installing the Google Analytics opt-out add-on for your web browser by visiting: <https://tools.google.com/dlpage/gaoptout> for your web browser.

- **Meta Pixel.** We use Meta Pixel with Limited Data Use enabled. Meta is granted access to California, Colorado (effective June 1, 2023) and Connecticut (effective June 1, 2023) resident information only to provide analytics on traffic through our Website as a service provider. Meta is not authorized to use such resident information for its own or other purposes.
- **Marketing Service Providers:** We use third-party service providers to assist us in our marketing efforts. For instance, we may use Hubspot to help us evaluate and measure the use and performance of our Services, to manage the provision of Services and to facilitate email marketing campaigns. You can learn more about Hubspot and view the Hubspot privacy policy at <https://legal.hubspot.com/product-privacy-policy>. These third parties are granted access to your information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.
- **Other Pivot Affiliates and Entities:** We may share or disclose your information to other entities in the Pivot family.
- **Legal Disclosures:** In limited circumstances, we may, without notice or your consent, disclose your personal information, any communications sent or received by you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, to investigate violations of our Terms of Use, or to protect the vital interests of us or any person. Note, these disclosures may be made to governments that do not ensure the same degree of protection of your personal information as your home jurisdiction. We may, in our sole discretion (but without any obligation), object to the disclosure of your personal information to such parties.

### Limiting Certain Uses of Your Information

- **Marketing and Promotional Materials:** At times, you may be presented with the option of whether to subscribe to receive, or be automatically entered to receive, certain marketing and promotional communications from Pivot. Recipients of such communications can unsubscribe by following the specific instructions included in such communications, including by clicking “Unsubscribe” and following the related instructions.
- **Your Cookie Choices:** You are in control of how you want to allow cookies to be used on your devices. Most internet browsers are initially set to accept cookies. You may set your browser to block or otherwise control what cookies your browser or device accepts via your browser or mobile device settings. Additionally, you can choose to modify your settings and delete cookies that are otherwise stored on your device. Please note that, if you choose not to accept cookies, some Website features and the personalization of our Services may no longer work for you. Please consult the instructions provided by your browser or your mobile device manufacturer to determine how you can limit the placement of and/or remove cookies or other similarly used technologies.
- **Google Analytics.** You can opt out of having your activity made available to Google Analytics by installing the Google Analytics opt-out add-on for your web browser by visiting: <https://tools.google.com/dlpage/gaoptout> for your web browser.
- **Do-Not-Track Signals:** Our Website does not currently support Do-Not-Track signals. Do Not Track is a preference available in some web browsers that is intended to inform websites that you do not want to be tracked.

How Your Information is Stored, Transferred and Secured

- **Retention and Deletion of Personal Information:** Pivot will retain your personal information only for as long as is necessary to accomplish the purposes set out in this Privacy Policy. We will retain and use your personal information to provide our clients with Services, the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, enforce our legal agreements and policies, and as required by essential, internal business needs.
- **Data Transfers:** Pivot operates in the United States. If you are located outside of the United States, your information, including personal information, may be transferred to the United States when you use our Services. As a result, your information may be subject to access requests from governments, courts, law enforcement officials and other lawful authorities in another jurisdiction according to its laws. Subject to the applicable laws, we will use reasonable efforts to ensure that appropriate protections are in place to maintain protections on the personal information.
- **Security:** Pivot takes the privacy and security of your information seriously, and uses reasonable and appropriate physical, technical, and procedural safeguards to protect your information. However, it is possible that third parties may unlawfully intercept or access transmissions or private communications despite our efforts to prevent this, and we therefore make no guarantees regarding the security of user information.

Children’s Privacy

All of our Services and our Website are intended for adult audiences, and are not meant to address anyone under the age of 16 (“Children”). As such, Children may not use our Website. If you are under 16, do not attempt to use any of our Services or our Website, and do not provide us any personal information about yourself.

We do not knowingly collect or sell the personal information of Children. If you are a parent or guardian and you are aware that your child has violated this Privacy Policy and provided us with personal information, please contact us. If we become aware that we have collected personal information from Children without verification of parental consent, we will take steps to remove that information from our systems.

California Residents

The California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA) provides you with rights regarding how your data or personal information is treated, and we want to ensure you understand and are able to exercise those rights.

a. Personal Information Collected Over the Last 12 Months

The following section describes the categories of personal information Pivot may have collected in the preceding twelve months, the categories of sources from which that information may have been collected, and the purpose for collecting that information. The personal information we collect depends on our relationship with you.

Category of Information	Examples of Information	Sources of Information	Purpose for Collecting the Information
Identifying Information	Name, signature, address, email address, phone	Customers or potential customers,	To provide Services or other business activities.

	number, or other identifiers.	users that fill out forms on our website.	
Payment Information	Credit card or debit card number, bank account number, routing number, and other financial information.	Customers.	To facilitate payment for Services.
Commercial Information	Records of Services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Customers interactions with our Services and Website.	For services, products, and warranty information.
Usage and Technical Information	Information about your interaction with our Website and content or advertisements on third-party sites or platforms; device information; information about users' interaction with our Website.	Automatic collection technologies on our Website.	To operate, maintain, provide, and improve our Website and Services; to provide requested and relevant content; to detect security incidents; to detect, prevent, and address technical issues; to secure our network and other devices; and to protect our network, property, and personnel.

**b. Personal Information Disclosed Over the Last 12 Months**

The following section lists the categories of personal information Pivot may have disclosed and the categories of recipients of such information in the preceding twelve months:

<b>Category of Information</b>	<b>Categories of Recipients</b>
Identifying Information	Our service providers, including marketing providers, and government entities (where required by law).
Commercial Information	Our service providers, including marketing providers.
Payment Information	Bank or third-party payment processors for processing.
Usage and Technical Information	Our service providers, including marketing providers, government entities (where required by law), and analytics providers.

**c. California Resident Rights**

California residents are afforded certain rights related to their information under state law. Pivot aims to take reasonable steps to allow California residents to access or delete your personal information, and

exercise other applicable rights. Pivot informs you that, where applicable under relevant law, individuals may be entitled to the following:

- **Right to Know:** The information we collect, use, and disclose about you is set out in this Policy, together with any other specific notices that are provided to you at the time of collection of your Information. Additionally, you can ask us to provide list of:
  - The specific pieces of your personal information Pivot holds;
  - The categories of personal information collected about you within the last 12 months;
  - The categories of sources of from which your personal information is collected;
  - The categories of third parties with whom your personal information was shared for a business purpose or sold in the last 12 months; and
  - The business or commercial purpose for collecting or disclosing your personal information.

This right is not absolute and only applies in certain circumstances.

- **Right to Delete:** You can ask us to delete your personal information that we have about you. This right is not absolute and only applies in certain circumstances.
- **Right to Access:** You have the right to have access to your personal information upon verifiable request. You may receive a copy of such information upon receipt of a verifiable request, along with other information related to the collection or processing of such information.
- **Right to Correct:** You have the right to correct inaccuracies in the personal information that Pivot holds about you upon receipt of a verifiable request.
- **Right to Opt-Out of the Sale or Sharing of Personal Information:** California residents have the right to opt-out of the sale or sharing of their personal information under certain circumstances. We do not sell or share personal information.
- **Right to Non-Discrimination:** You have a right to non-discrimination in the Services or quality of Services you receive from us for exercising your rights conferred by the CCPA as amended by the CPRA. This right is limited and does not apply in certain circumstances.
- **Right to Disclosure of Direct Marketers:** You can ask us to provide the categories of information we disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, and the names and addresses of the third parties that received the information.
- **Right to Limit:** You have the right to limit certain uses or disclosures of Sensitive Personal Information. Our uses of sensitive personal information are described in the Sensitive Personal Information section above.
- **Authorized Agent:** Under California law a consumer can appoint an “authorized agent” to make certain verifiable requests upon their behalf, such as the right to know what information we collect about the consumer or to request deletion of the consumer’s information. An “authorized agent” may submit a request on behalf of a California resident who has authorized the agent to act on their behalf. Because the security and privacy of your information is paramount, we will ask that you identify such persons and directly confirm that such persons are authorized to act as your agent and exercise your applicable rights under California law in such situations. This may require us to contact you directly and alert you that an individual has claimed to be your agent and is attempting to access or delete your information. We will also independently verify your identity to ensure that an unauthorized person is not attempting to impersonate you and exercise your rights without authorization. We will not share your information or honor any other requests in those situations where you cannot or do not grant permission in writing for an identified authorized agent to act on your behalf, or where we cannot independently verify your identity.



#### **d. Submitting a Privacy Rights Request**

As described above, California residents have certain rights to access, delete, or otherwise control the use, collection, and/or disclosure of their information. Pivot will respond to an individual's "verifiable request" to exercise their rights under such laws, that is, where we have received a request purporting to be from a particular individual, and we have been able to verify the individual's identity. The need to verify an individual's identity is critical to protecting your information, and ensuring that your information is not shared with anyone pretending to be you or someone who is not authorized to act as your agent.

You may submit a verifiable request via the following:

By email to [compliance@pivotinteriors.com](mailto:compliance@pivotinteriors.com)

or

By toll-free number: 888-482-8808

We will ask you to provide information about yourself so that we can verify your identity as part of this process. This information may include your name, address, services you have received from us, account information and any other information deemed necessary by Pivot to reasonably verify your identity, to ensure that your information is not shared with anyone impersonating you. Once we have verified your identity, we will work to fulfill your request in a timely manner. Please note there may be some situations in which we are unable to fulfill your request, such as if we cannot find any information about you within our systems. Additionally, we may not be able to honor a deletion request in some situations, such as if your information is necessary to fulfill the Services you requested or meet a legal obligation. We will inform you whether we can fulfill your rights request.

We may ask for additional information if we have difficulty confirming your identity. We will not share your information or honor other requests in those situations in which we are unable to confirm a request for your information is a "verifiable request."

Please note when you request to know or access to your personal information, there will be some personal information which we are not able to disclose to you, such as documents which include confidential or personal information about another entity or person; documentation relating to management forecasting or planning; and copies of references. We will not be able to comply with your request in certain circumstances, for example where your request is manifestly unfounded or excessive.

#### **Contact Us**

If you have questions about this Privacy Policy or our practices related to the collection and use of personal information, please contact Pivot using the email address below:

By email: [compliance@pivotinteriors.com](mailto:compliance@pivotinteriors.com)

#### **Third-Party Platforms and Services**

The Services and the Website may be linked to, rely on, and/or be integrated with websites, applications, interfaces, services, and/or platforms operated by third-party companies, including service providers. This Privacy Policy does not govern the practices of third parties, including our partners, third-party service providers, and/or advertisers. Pivot is not responsible for and does not control the security or privacy of your information when you visit those sites. Pivot encourages you to visit the privacy notices governing those sites.

#### **Changes to this Policy**

This Privacy Policy is subject to revision. If we make any changes to this Privacy Policy, we will change the "Last Updated" date above.

**Difficulty Accessing Our Privacy Policy?**

Individuals with disabilities who are unable to usefully access our privacy policy online may contact us at the above-listed contact information to inquire how they can obtain a copy of our policy in an alternative format.