

Lulu Press, P.O. Box 12018, Durham, NC 27709

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Lulu Jr., which is owned and operated by Lulu Press, Inc. (“We, “Us” or “Our”), respects your privacy, including the privacy of your personal information. Please read Our Privacy Policy below in order to fully understand our approach to user safety and the collection and use of personal information. The Lulu Jr. website (the “Website”), Privacy Policy and information collection procedures are intended to comply with the Children's Online Privacy Protection Act (COPPA).

1. Information Collected Through Our Site

We gather two basic types of information through the Site: personally identifiable information that identifies a person as an individual ("Personal Information") and non-personally identifiable information, which includes aggregated information, demographic information, IP addresses and any other information that does not reveal a person's specific identity ("Non-Personal Information").

- **Personal Information.** You do not have to provide Personal Information to use the Site. However, you may need to provide certain Personal Information to use some of our services. When you order Content or other paid products or services, we will need the shipping address, billing name and address, as well as the credit card number and expiration date.
- **Non-Personal Information.** When you visit and interact with the Site, we and our service providers and business partners may collect Non-Personal Information from sources such as server log files, environmental variables (such as your MAC address, computer type (Windows or Macintosh), screen resolution, OS version, Internet browser, and Internet browser version) and from scanning navigational data to collect Non-Personal Information about our users in order to help us deliver better service and user experience. Such Non-Personal Information could include the web site you were on before coming to Lulu Jr., IP addresses, or areas of site being clicked on most frequently. We and our service providers (including ad servers, outbound email vendors, affiliate vendors and search engine advertising agencies, and providers of web analytics tools) and business partners may also use "cookies" as well as so-called "pixel tags," "web beacons," "clear GIFs" and other similar technologies to help us deliver better service and user experience and to facilitate your ongoing access to and use of our Site. Cookies are small data files stored by your web browser on your computer's hard drive. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies, or to be given the choice of declining or accepting the transfer

of a particular cookie, or cookies from a particular website, to your computer. If you choose to reject all cookies, you may not be able to access the Site.

2. How We Use the Information We Collect

- **Personal Information.** We may use Personal Information in the following ways:
 - **Fulfillment of Requests.** We may use Personal Information to fulfill the purpose for which such Personal Information was provided (e.g., to fulfill your purchase or other transaction).
 - **Administrative Communications.** From time to time we may send you service announcement updates with important information about Lulu Jr. Service announcements may contain information vital to your account, therefore members may not unsubscribe from service announcements.
 - **Other Communications.** We may notify you via email or through the mail about new features, products and promotions. We may also send you information on carefully screened third parties whose products or services may be of interest to you. If you wish to unsubscribe from these mailings, you may do so.
 - **Contests and Surveys.** We may occasionally request Personal Information through surveys or contests. Participation in these surveys or contests is completely voluntary. The Personal Information collected is only used for purposes of improving user satisfaction with Lulu Jr. products and services, or in some cases, to notify winners and to deliver prizes. No Personal Information collected through these means is shared with or available to other third parties for such third parties' direct marketing purposes.
 - **Testimonials.** Testimonials are used to show benefits to certain programs Lulu Jr. offers. Lulu Jr. always seeks consent prior to posting any testimonial in which Personal Information is included.
 - **Customer Service.** Any Personal Information obtained through your contact with our Customer Service team or communications with us, such as chat or emails, may be recorded to help us provide better service.
 - **Internal Business Purposes.** We may also use Personal Information about you for our internal business purposes, such as data analysis, audits and so forth.

- **Combining Information.** At times, we may combine Personal Information collected from our Site and other information you shared with us to customize our service to you and improve your experience. For example, we may recommend products or offers you may be interested in based on what you have liked in the past, or remind you that you have an "active" shopping cart waiting for you. Additionally, in order to provide certain services to you, we may on occasion supplement the Personal Information you submitted to us with information from third party sources. For example, we use the US Postal Service's national change of address database in order to verify customer mailing addresses.
- **Non-Personal Information.** Because Non-Personal Information does not personally identify you, we may use such information for any purpose. In addition, we reserve the right to share Non-Personal Information, which does not personally identify you, with third parties, for any purpose. For example, we might tell our business partners that a certain percentage of our customers live in California, while a different percentage live in New Jersey. In some instances, we may combine Non-Personal Information with Personal Information (such as combining your name with your geographic location). If we do combine any Non-Personal Information with Personal Information, the combined information will be treated by us as Personal Information hereunder as long as it is so combined.

3. Disclosures of Personal Information

- **Third Party Service Providers.** Lulu Jr. shares Personal Information with carefully screened third-party service providers to provide you with the products, services and information you have requested. Examples of such third-party service providers include credit card authorization companies, merchandise distributors, and shippers. Lulu Jr. has instructed these service providers not to store, retain or access your Personal Information except to provide our services to you.
- **Third Party Products and Sites.** Lulu Jr. also may share Personal Information with third parties to allow such third parties to provide you with the products, services and information that you have requested. This could include, but is not limited to packages of discounts, rebates, and promotional offers, that are not Lulu Jr. products, services or information. Such third parties from whom you have requested products, services and information will handle, store, retain, use, share and access Personal Information in accordance with the terms and conditions of their agreement(s) with you, as well as their own privacy policies, and may use your Personal Information for direct marketing

purposes. It is your responsibility to carefully review such terms and conditions and privacy policies, and Lulu Jr. disclaims any and all liability relating thereto.

- **Third Party Communications.** Lulu Jr. also may share Personal Information with third parties for such third parties' direct marketing purposes. Such third parties to whom we transfer Personal Information for direct marketing purposes will handle, store, retain, use, share and access Personal Information in accordance with their own privacy policies. It is your responsibility to carefully review such terms and conditions and privacy policies, and Lulu Jr. disclaims any and all liability relating thereto. If you would prefer that we do not share your Personal Information with such third parties for their direct marketing purposes, you may submit an opt-out request as described in Section 6 ("Opt-Out") below.
- **Forums.** Through the Site, Lulu Jr. may make available forums to which you can post information and materials. These forums may include, for example, user forums and blogs. Please note that any information you disclose through such services becomes public information, and may be available to users of the Site and to the general public. In addition, when you choose to make a posting on such services, certain Personal Information (for example, a user's name will appear next to a blog post or a user comment) will be available for other users to view. We urge you to exercise discretion and caution when deciding to disclose Personal Information, or any other information, through the Site. WE ARE NOT RESPONSIBLE FOR THE USE OF ANY PERSONAL INFORMATION YOU VOLUNTARILY DISCLOSE THROUGH THESE SERVICES.
- **Law Enforcement; Emergencies; Compliance.** Lulu Jr. may disclose Personal Information in the following situations as we believe to be appropriate, even though you might have requested that we don't share your information: (a) under applicable law; (b) to comply with legal process; (c) to respond to governmental requests, including requests from law enforcement and regulatory authorities; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect the rights, privacy, safety or property of Lulu Jr., you or others; and (g) to permit us to pursue available remedies or limit the damages that we may sustain. For example, we may, to the fullest extent the law allows, disclose Personal Information to law enforcement agencies and regulatory authorities to assist them in identifying individuals who have been or may be engaged in unlawful activities.
- **Assignment.** We reserve the right to transfer Personal Information to a new entity or third party as part of a merger, acquisition, reorganization, sale of some or all of our assets, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including

without limitation in connection with any bankruptcy or similar proceedings). We will notify you via email and/or prominent notice on our Web site if the third party's or new entity's treatment of Personal Information will materially differ from the treatment described in this Privacy Policy; this notice will be provided at least 30 days before such material changes take effect.

4. Financial Information

When a user elects to order merchandise at Lulu Jr., We will collect the following information: a parent's or legal guardian's full name, e-mail address, credit card information, shipping address, billing address, and telephone number. We must share this information with third parties to the extent necessary to fulfill the order placed by the user. All credit card information is stored by Our merchant account provider for the purpose of processing credit card payments made to Lulu Jr.

We do not permit children under the age of 13 to place any orders without the express written permission of their parent or legal guardian. If We have reason to believe that a user under the age of 13 is attempting to place an order, the user will be asked to have a parent or legal guardian provide written authorization.

We use Secure Socket Layer (SSL) software, the industry standard, to ensure secure commerce transactions by encrypting all of your personally identifiable information, including credit card numbers, name and address so that it cannot be read over the internet.

5. Use of Cookies

Cookies are small text files that are saved by your internet browser when you visit a website in order to store your preferences. We may use cookies to learn about general site usage, such as how often users visit certain parts of Our site. We will not connect this information with any personally identifiable information.

6. Third Party Disclosure

Other than for purposes of ordering merchandise, We do not share any personally identifiable information about any user, including any user under the age of 13, with any third party vendors or companies, unless We are required to do so by subpoena, court order or legal process or in order to exercise Our legal rights or defend against legal claims.

We may disclose general site statistics and group user information to partners, vendors, and other relevant parties. All such disclosures will be in an aggregate form and will not be able to be tied back to individual users.

7. Business Transfer

In the event that Lulu Press, Inc., LLC, which owns and operates the Lulu Jr. Website, or substantially all of its assets are acquired by a third party, user information will be one of the transferred assets. However, use of any information collected on children under the age of 13 will only be used in accordance with the policies set forth herein in compliance with COPPA.

8. Security Measures

We use reasonable administrative, technical, personnel and physical measures to safeguard your personally identifiable information in its possession against loss, theft and unauthorized use, disclosure or modification. While We implement the above security measures on the Website, you should be aware that 100% security is not always possible. As a result, while We strive to protect a visitor's personally identifiable information, We cannot ensure or warrant the security of any information transmitted to Us or from Our online products or services, and a user does so at his/her own risk.

9. Changes and Notification

We reserve the right to modify our Privacy Policy at any time. If our Privacy Policy changes, the revised policy will be posted on the Site and we will change the 'Last Updated' date at the top of this page to reflect the date of the modification. Please check back periodically. Any changes to our Privacy Policy will become effective upon our posting of the revised Privacy Policy on the Site. Use of the Site following such changes constitutes your acceptance of the revised Privacy Policy then in effect.

10. Jurisdictional Issues

The Site is controlled and operated by us from the United States of America, and is not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States of America. We do not represent or warrant that the Site, or any part of the Site, is appropriate or available for use in any particular jurisdiction. Those who choose to access the Site do so on their own initiative and at their own risk, and are responsible for complying with all local laws, rules and regulations. We may limit the Site's availability, in whole or in part, to any person, geographic area or jurisdiction we choose, at any time and in our sole discretion.

YOUR CALIFORNIA PRIVACY RIGHTS

- **Requesting Personal Data & CCPA Compliance.** California law, pursuant to the California Consumer Protection Act (CCPA), allows users who are residents of California to request a summary of Personal Data we have

collected during the previous 12 month period. This includes personal data used for your account, security, sales and revenue data, and information Lulu provides to third party service providers as outlined elsewhere in this privacy policy. Lulu does not ever sell your information, though we may share it for specific marketing purposes through our third party providers. You may request that we do not share your information with any third party service providers at any time by contacting us at the address listed below. Lulu will provide Personal Data and/or remove your Personal Data upon a verified request. To request a summary of your personal data or that your personal data be removed, please contact Lulu at supportcc@lulu.com.

FURTHER RESOURCES FOR PARENTS OR LEGAL GUARDIANS OF OUR USERS

Ability to Review or Delete Information: Please contact Us if you would like to review the personally identifiable information associated with your child's Account, request to have your child's Account discontinued, request to have your child's personally identifiable information deleted, or if you have any additional questions about Our Privacy Policy. We will take reasonable steps to verify your identity prior to releasing any personally identifiable information associated with your child's account.

All such inquiries and comments should be sent to support@lulujr.com. Please make sure to include your e-mail address and telephone number so We can reach you to respond to your request.