



## Privacy Policy

Last Updated [05/13/2021]

Oana, LLC (“Oana,” “we,” or “us”) respects and values your privacy. As part of our commitment to using the information that you share with us responsibly, we want you to be familiar with how we collect, use, and disclose information relating to you, your computer, or your device and that enables your identification (“Personal Information”).

This Privacy Policy describes how we process Personal Information about you that we collect through each website, application, or online property operated and controlled by us from which you are accessing this Privacy Policy (the “Site”). This Privacy Policy does not apply to information that we collect offline, such as over the telephone or in person. By using the Site, you agree to the terms and conditions of this Privacy Policy.

### 1. WHAT INFORMATION DO WE COLLECT ABOUT YOU?

#### a. What You Give Us

Some parts of the Site may ask you to submit Personal Information in order for you to benefit from the specified features or to participate in a particular activity. For example, you may voluntarily provide Personal Information to us in the following ways:

- **Registration For An Account:** If you register for an account with us, we will collect the information that you voluntarily provide when registering. This information may include your name, phone number, zip code, username, and password.
- **Contact Us Forms and Correspondence:** If you contact us, we may keep a record of that correspondence. For example, we collect the information that you provide on the “contact us” form available on the Site.
- **Subscribe to Mailing List:** If you subscribe to our email mailing list, we will collect your email address.
- **Social Media Use:** We receive Personal Information that we collect from your interaction with our social media pages, including on Facebook and Instagram.
- **Posts:** We collect any Personal Information that you provide to us in publicly available posts on the Site.
- **Communications:** Our systems will store information, including Personal Information, in direct chat communications between users in order to enable the chat function through the Site.

- **Third-Party Account Information:** If you provide your third-party account credentials to us or otherwise sign into the Site through a third-party site or platform service, you understand some content and/or information in those accounts (“Third-Party Account Information”) may be transmitted into your account with us to the extent you authorized such transmissions. One such service may include the ability for you to automatically transmit Third-Party Account Information to your account with us or to automatically transmit information in your account with us to a third-party account.
- **Other:** We may inform you of other Personal Information collected by or through the Site at the point of collection.

Please note that information posted to the Site may be accessible for other users. Any Personal Information that you disclose in such contexts may become public information and may be viewed and used by others. You are solely responsible for the content that you post online. Oana has no control over and will not be held responsible for any Personal Information disclosed on or through the Site or the use of such Personal Information by third parties. By submitting Personal Information on or through the Site, you acknowledge that you have no expectation of privacy with regard to any posting or communications. You should always exercise caution when deciding to disclose your Personal Information.

We may combine Personal Information you submit through the Site with other information we have collected from you, whether on-line or off-line. We treat the combined information in accordance with this Privacy Policy.

**b. Information from Use of the Site**

Through your use of the Site, we may also gather information about your use of the Site that does not identify you directly but may identify your computer or device. Generally, this information is collected through what we refer to in this Privacy Policy as “Traffic Data.” We may collect and store such Traffic Data automatically whenever you interact with the Site. For example, we may collect your IP address, the hostname of your computer, browser information and reference site domain name every time you use the Site. We may collect information regarding user traffic patterns and Site usage. This Traffic Data does not, however, contain anything that can personally identify you, though it may identify your computer or device. Traffic Data is used to analyze and improve the Site, to provide you with a better experience on the Site, and to show you offers tailored to you.

**c. Data about Children**

We do not knowingly collect Personal Information through the Site from children under the age of 13. We reserve the right to delete any information identified as having been provided through the Site from children under the age of 13.

**2. HOW DO WE USE THE INFORMATION WE COLLECT FROM YOU?**

We use Personal Information submitted by you or otherwise collected through the Site for the purposes described in this Privacy Policy and as otherwise described to you at the point of collection. Generally, we use the information you provide for the reason for which it was

provided. For example, if you contact us by e-mail, we will use the Personal Information you provide to answer your question or resolve your problem and will respond to the email address from which the contact came. We may also use Personal Information about you as specifically described below:

- **Accounts:** We may use your Personal Information to create and manage your personal account with Oana.
- **Requests and Inquiries:** We may use your Personal Information to process, evaluate, and respond to your requests and inquiries. If you request certain information from us, we will use your Personal Information to process and respond to your request.
- **Mailing List:** If you join our email mailing list, we will use your email, other information you have provided to us, and Traffic Data to send you promotional emails that we think may be of interest to you. If you supply us with your postal address, you may receive periodic mailings from us with information on new products and services or upcoming events. You can opt-out of our email or postal mail mailing list as described in Section 8 of this Privacy Policy.
- **Manage Our Relationship With You:** We may use your Personal Information to send you important information regarding our relationship with you or regarding the Site, such as information about changes to our terms, conditions, policies, and other administrative information.
- **Internal Business Purposes:** We may use your Personal Information for internal business purposes, including without limitation, to help us operate, evaluate, and improve the quality of the Site; to better understand those individuals that utilize the Site; to verify your identity; to prevent, protect against, identify, or address fraud, unauthorized activity, claims, liabilities, and other wrongdoing; to provide you with customer service; and to generally manage our business.
- **Analytics:** We may use Traffic Data to perform data analytics. To learn more about how we use Traffic Data, please see Section 4 of this Privacy Policy.
- **Online Promotions:** We use Traffic Data and other Personal Information to let you know about events, offers, products, and services that we think may be of interest to you, including through direct mail, email, on our Site, and on third party sites.
- **Legal Requirements, Industry Standards, and Contractual Obligations:** We may use your Personal Information for complying with and enforcing applicable legal requirements, industry standards, and our contractual obligations.
- **Other Purposes:** We may use your Personal Information for any other purpose specified at the point of collection.

We may use non-personal information or aggregate information that does not identify an individual without restriction, and we may share such information with third parties.

### 3. WITH WHOM DO WE SHARE YOUR INFORMATION?

We may share your Personal Information only as described in this Privacy Policy or as otherwise described to you at the point of collection.

- **Affiliates:** We may share your Personal Information with our affiliates for purposes consistent with this Privacy Policy. Our affiliates will be bound to maintain that Personal Information in accordance with this Privacy Policy.
- **Service Providers:** We may share your Personal Information with individuals or companies that we hire to provide services to us, such as website hosting services, logistics professionals, and delivery companies.
- **Business Partners:** We may share information with third party marketing companies and advertising partners, who may use the information to deliver advertisements about our products and about third-party products that may be of interest to you by mail, email, on this website, or on other websites.
- **Business Transfers:** We may transfer your Personal Information in the event of a business sale, merger, consolidation, change in control, transfer of substantial assets, bankruptcy, liquidation, or reorganization. We may also disclose your Personal Information in the course of due diligence of such a transaction. You acknowledge and agree that any successor to or acquirer of Oana (or its assets) will continue to have the right to use your Personal Information and other information. Whether the recipient of your Personal Information in these cases will handle your Personal Information pursuant to this Privacy Policy will depend on the applicable law and other factors.
- **Legal Requirements:** We use and disclose Personal Information as we believe to be necessary or appropriate: (i) under applicable law, including laws outside your country of residence; (ii) to comply with legal process; (iii) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (iv) to enforce our terms and conditions; (v) to protect our operations or those of any of our affiliates; (vi) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (vii) to allow us to pursue available remedies or limit the damages that we may sustain.
- **Passively Collected Information:** We may share Traffic Data that does not identify you directly, but may identify your computer or device, as described in Section 4 of this Privacy Policy.
- **Posts; Communications:** If you provide Personal Information on the Site through a post or in communications with other users (e.g., chat function, email, telephone), this information may be publicly available.

#### 4. COOKIES AND OTHER PASSIVE COLLECTION TECHNOLOGIES

As you navigate the Site, certain Traffic Data may be passively collected, meaning it is gathered without your actively providing it. This is done using the following technologies in the following ways:

- **Through your browser:** Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type and operating system type and version screen resolution, and Internet browser type and version.
- **Through your device:** If you access the Site through a mobile device or other network-connected product, certain information may be collected about that device, including your device type, network service provider, and other identifiers. We may collect unique device identifiers (such as IDFA and AID tags and UUID and UDID identifiers) associated with the devices you use to access the Site.
- **Using cookies:** Like many companies, our Site may use “cookies” to help make sure the Site is meeting the needs of its users and to help us make improvements. Cookies are bits of text that are placed on your computer’s hard drive when you visit certain websites. We may use cookies set by us on the Site to tell us, for example, whether you have visited us before or if you are a new visitor. You can refuse our use of some or all cookies by turning off the use of cookies in your web browser. If you use your browser settings to block all types of cookies you may not be able to access all or parts of our Site or functionality may be limited. You can set your browser to notify you before you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to turn off cookies. Changing your internet browser settings can prevent the use of cookies. Each browser has a different procedure for disabling the use of cookies. The Help function within your browser should tell you how. Alternatively, you may visit <http://www.aboutcookies.org> where you can review information on how to control cookies on a variety of browsers.
- **Using Monitoring Tools:** Cookies are not the only way to recognize or track visitors to a website. We may use other, similar technologies from time to time, like web beacons (sometimes called “tracking pixels” or “clear gifs”) to better tailor the Site in order to provide a better service. These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Site. These technologies usually work in conjunction with cookies. To disable cookies used on our Site, and therefore any other tracking technologies that work in conjunction with these cookies, please follow the instructions below.
- **IP Address:** Your IP Address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. An IP Address is identified and logged automatically in our server log files whenever a user visits the Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many online service providers, including website operators. We use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, and administering the Site.

- **Location-Based Features:** We may collect the physical location of your device and use it to provide you with personalized location-based services or content. Where available, location-based services may use GPS, Bluetooth, and your IP Address, along with crowd-sourced Wi-Fi hotspot and cell tower locations, and other technologies to determine your devices' approximate location. In some instances, you may be permitted to allow or deny such use of your device's location, but if you choose to deny such use, we may not be able to provide you with the applicable personalized services or content. In all other instances, you affirmatively consent that we may receive, use, share and transfer information about the physical location of your device in accordance with this Privacy Policy.
- **Social Media Plug-Ins:** We use social media plug-ins from social media networks like Facebook and Instagram, which are labeled on our Site with the well-known symbols of the respective social network. If you interact with these plug-ins, your activity on the Site may also be made available to those social networks. In order to understand how those social networks use and disclose your Personal Information, please review the privacy policies available on the websites of those social networks.
- **Do Not Track Signals:** Our Site currently does not respond to "Do Not Track" (DNT) signals and operates as described in this Privacy Policy whether or not a DNT signal is received.

Although our use of passive collection technologies may change over time as technology evolves, the above descriptions are designed to provide you with additional detail about our current approach to information collected from passive technologies.

## 5. THIRD PARTY WEBSITES

We are not responsible for the privacy practices of other online services, including other websites, advertisers, payment processors, and social media. It is your sole obligation to review and understand the privacy practices and policies of third parties. We do not control the use of cookies or the collection of information by these third parties, nor how they manage such information. The availability of, or inclusion of a link to or interface with, any third-party services on the Site does not imply endorsement of it by us or by our affiliates. Your use of other sites and services is subject to the privacy policies of those sites and services, not this Privacy Policy.

## 6. SECURITY

We take what we believe to be reasonable steps to protect the Personal Information collected by us from loss, misuse, unauthorized use, access, inadvertent disclosure, alteration, and destruction. However, no network, server, database, or Internet or email transmission is ever fully secure, error-free, or "hacker proof." Therefore, you should take special care in deciding what information you provide to us. Please keep this in mind when disclosing any Personal Information.

## 7. DATA RETENTION

We generally retain Personal Information for so long as it may be relevant to the purposes above, or for longer when required by law. To dispose of Personal Information, we may anonymize it, delete it, or take other appropriate steps. Even if we delete your Personal Information, it may persist on backup or archival media for an additional period of time for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes.

## 8. YOUR RIGHTS AND CHOICES

*Opt Out From Direct Electronic Communications.* We may send you direct electronic communications, such as through email. You may “opt out” of receiving these electronic communications by following the instructions in the message that you receive, or by sending an email to [digitalcommsoptout@oana.com](mailto:digitalcommsoptout@oana.com) indicating which communications you no longer wish to receive. Note that if you are a user we may still send certain administrative messages to you by email. Please note that if you use more than one name or email address when communicating with Oana or using the Site, you may continue to receive communications from us to any name or email address not specified in your opt-out request.

*Opt Out From Postal Mailing List.* We may send you direct communications by mail to your postal address. You may “opt out” of receiving these communications by sending an email to [directmailoptout@oana.com](mailto:directmailoptout@oana.com) indicating which communications you no longer wish to receive.

*Opt Out From Cookie-Related Processing.* You can opt out from certain cookie-related processing as described in Section 4 of this Privacy Policy.

*Additional Opt Out Rights.* You may opt out of having your directly identifiable Personal Information, which has been voluntarily provided to us through online forms, membership or registration forms, surveys, or e-mail, prospectively retained by us, used by us for secondary purposes, or disclosed by us to third parties, by contacting us via email at [CCPA@oana.com](mailto:CCPA@oana.com) and including your name and physical address. Please note that certain exceptions to this opt-out right may apply where permitted by applicable law, including where we are unable to verify your identity, where Personal Information is necessary to obtain the products or services you have requested, or where Personal Information must be retained to comply with applicable law or legal process.

*Right to Access and Correct.* Upon your request via postal mail, e-mail, or telephone, we will provide you with a summary of any directly identifiable Personal Information retained by us that has been voluntarily provided by you to Oana through online forms, membership or registration forms, surveys, or e-mail. You may modify, correct, change or update your Personal Information by contacting us via postal mail, e-mail, or telephone at the addresses or numbers above.

## 9. CALIFORNIA RESIDENTS

If you are a California resident, California Civil Code Section 1798.83 provides you with the right to request certain information regarding disclosure of your personal information to third parties for direct marketing purposes, including a description of the categories of personal

information disclosed. In order to obtain such information, please email your request to [privacypolicy@oana.com](mailto:privacypolicy@oana.com) or write to us at the address above.

## **10. UPDATES AND CHANGES TO OUR PRIVACY POLICY**

The business and operations of Oana may change from time to time. As a result, at times it may be necessary for us to make changes to this Privacy Policy to reflect changes in the law, our data handling practices, or the features of our services, websites, and apps. We reserve the right, in our sole discretion, to update or modify this Privacy Policy at any time. Modifications to this Privacy Policy will be posted on the Site and the new Effective Date will be displayed at the top of this Privacy Policy. In certain circumstances, Oana may, but need not, provide you with additional notice of such modifications, such as via email. Modifications will be effective thirty (30) days following the Effective Date, or such other date as communicated in any other notice to you. Where required by applicable law, we will apply changes only with your consent.

Please review this Privacy Policy periodically, and especially before you provide any Personal Information. This Privacy Policy was updated on the date indicated above. Your continued participation in our programs, services, and events following the effectiveness of any modifications to this Privacy Policy constitutes your acceptance of those modifications. If any modification to this Privacy Policy is not acceptable to you, you should cease accessing, browsing, and otherwise utilizing Oana's website, as well as its programs, services, and events.

## **11. HOW TO CONTACT US**

If you have any questions regarding this Privacy Policy or the use of your Personal Information under this Privacy Policy, you can contact us at [privacypolicy@oana.com](mailto:privacypolicy@oana.com).