# **Privacy Policy**

Last Updated: September 25, 2023

JD Staron LLC (referred to as "JD Staron", "we", or "us") values its customers and respects your privacy and wants you to be familiar with how we collect, use, and disclose information. This Privacy Policy describes our practices in connection with information that we collect through our websites and mobile software applications operated by or on behalf of JD Staron, including the website located at <a href="https://www.idstaron.com">https://www.idstaron.com</a>

#### **UPDATES TO THIS POLICY**

We may change this Privacy Policy at any time. Please look at the "Last Updated" legend at the top of this page to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective on the "Last Updated" date indicated above. By using the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a>, or providing information to us following such changes, you will have accepted the revised Privacy Policy.

#### PERSONAL INFORMATION WE COLLECT

We collect two types of information: Personal Information and Other Information. "Personal Information" is information that relates to you as an identifiable specific individual. "Other Information" is any information that is not traceable to you as a specific individual. "Other Information" is addressed below, under the heading "Other Information."

Our service providers and we may collect the following Personal Information:

- Name
- · Postal address (including billing and shipping addresses)
- Telephone number
- Email address
- Credit and debit card number

IF YOU SUBMIT ANY PERSONAL INFORMATION RELATING TO ANYONE OTHER THAN YOURSELF, YOU REPRESENT THAT YOU HAVE OBTAINED ANY NECESSARY CONSENT FROM THAT INDIVIDUAL FOR THE USE AND DISCLOSURE OF THAT INDIVIDUAL'S PERSONAL INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY.

#### **HOW WE COLLECT PERSONAL INFORMATION**

We collect Personal Information from multiple sources. While we collect Personal Information from you directly, we may also use third-party sources of information in order to fulfill the purposes set out in this Privacy Policy. These sources can include:

- Financial institutions (e.g., your credit card company or your bank)
- Services providers
- Marketing partners
- Marketing and advertising agencies and networks

While we may collect Personal Information from all these sources, we will only use and disclose Personal Information in accordance with this Privacy Policy.

#### HOW WE USE PERSONAL INFORMATION

Depending on the purpose, we may use various categories of information in order to achieve the effects you and we expect. As such, it is difficult to specifically call out which category of data will be used for which purpose, as the context and circumstances may require, we use Personal Information for multiple purposes. As such, we find it more useful to describe the purposes for which our service providers and we may use any Personal Information we have collected about you. To that end, we may use Personal Information about you:

- To respond to your inquiries and fulfill your requests, including contacting you if necessary.
- To process and fulfill your order, for example, by confirming your order and your billing and shipping
  information, processing your payments, delivering your products, and communicating with you regarding
  your order.
- To send you essential information regarding the JD Staron, changes to our terms, conditions, and policies, and other administrative information
- To send you information by email, postal mail, telephone, and other means about our products, services, and other promotions
- To administer and fulfill our promotions (please note that certain promotions may have additional rules or policies, which could contain different or additional information about how we use and disclose your personally identifiable information; we suggest that you read any such rules or policies carefully in the event of a conflict between such rules or policies and this Privacy Policy, such rules or policies will govern)
- To help us improve the customer experience, including by learning more about your preferences to help personalize your experience with us.
- To analyze trends and statistics in connection with our businesses and Internet properties, including but not limited to measuring the success of marketing campaigns and compiling statistics about usage and response rates.
- To protect the security or integrity of our businesses and Internet properties
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our Affiliates; (f) to protect our rights, privacy, safety or property, or that of you, our Affiliates or others; and (g) to allow us to pursue available remedies or to limit the damages that we may sustain

### **HOW PERSONAL INFORMATION IS DISCLOSED**

Similarly, to how we use Personal Information, we may disclose Personal Information to service providers, and sometimes third-parties, for various purposes. To this end, we may disclose Your Personal Information to the following entities for the purposes associated with each entity as noted below:

- To our third-party service providers, who provide services such as website hosting, data storage, data analysis, payment processing, order fulfillment, IT services and infrastructure, customer service, email delivery and administration, credit card processing, auditing, and other similar services to enable them to provide services.
- To our subsidiaries and affiliated entities (collectively, our "Affiliates") for marketing and other purposes
- To select third parties ("Promotional Partners"), to permit them to send marketing communications to you. JD Staron seeks to select as Promotional Partners only reputable companies that offer what we believe to be high-quality products and services.

- By you, on message boards, chat, profile pages and blogs, and other services to which you are able to post information and materials (please note that any information and materials that you post or disclose through such services will become public information and may be available to visitors to JD Staron and to the general public; we urge you to be very careful when deciding to disclose your Personal Information, or any other information, on or through the JD Staron Online Properties)
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding)
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our Affiliates; (f) to protect our rights, privacy, safety or property, or that of you, our Affiliates or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain

#### OTHER INFORMATION WE COLLECT

"Other Information" is any information that does not generally identify you as a specific individual, such as:

- Browser information
- Server log files
- Information collected through cookies, pixel tags, and other technologies.
- The physical location of your device
- Demographic information and other non-personally identifiable information provided by you.
- Aggregated information

Sometimes "Other Information" is capable of being connected to you as a specific individual. If that is the case, then the information is not "Other Information" but is "Personal Information" and will have the same protections as Personal Information.

#### **HOW WE COLLECT OTHER INFORMATION**

Our third-party service providers and we may collect Other Information in a variety of ways, including:

- Through your browser: Certain information is collected through most devices, such as your Media Access Control ("MAC") address, device manufacturer and model, device identifier, screen resolution, as well as the type and version of your operating system and browser.
- Through server log files: An Internet Protocol ("IP") address is a number that is automatically assigned to
  a device by an Internet Service Provider ("ISP") and is identified and logged automatically in our server log
  files whenever a user visits the JD Staron website, <a href="https://www.jdstaron.com">https://www.jdstaron.com</a>, along with the time of the
  visit and the page(s) that were visited. Our service providers use IP addresses for purposes such as
  calculating usage levels, helping diagnose server problems, and administering the JD Staron
  website <a href="https://www.idstaron.com">https://www.idstaron.com</a>,
- Using cookies: Cookies allow a web server to transfer data to a device for recordkeeping and other purposes. Our service providers and we use cookies and other technologies to, among other things, enhance and personalize your online browsing and shopping experience and facilitate your ongoing access to and use of the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a>, as well as for online tracking purposes. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to decline the use of cookies. If you choose to decline cookies, some or all of the features, functionality, and promotions available through the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a>, may not be available to you.

- Analytics: We may use third-party services, such as Google Analytics or IBM Coremetrics, in connection with the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a>. Such services use cookies and similar technologies to analyze how visitors use the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a> to compile statistical reports on activity related to the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a> and to provide other services related to the JD Staron website. Such services may also collect information about visitors' use of other websites or other online resources. For more information about Google Analytics, including how to optout, please visit <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>.
- Flash Local Stored Objects: Our service providers and we may use a third-party technology, called Flash, in connection with the ID Staron website https://www.idstaron.com, including our online content. Flash provides a facility, referred to as Local Stored Objects ("LSO"), that allows a website operator or online content provider (or their service providers) to store certain information locally on an individual's device; for example, Flash LSOs can be used to store information regarding an individual's device. If you do not want Flash LSOs stored on your device, you can adjust the settings of your Flash player to block Flash LSO storage using the Website Storage Settings Panel. You can also control Flash LSOs by going to the Global Storage Settings Panel and following the instructions (which may include instructions that explain, for example, how to delete existing Flash LSOs (referred to as "information" on the Macromedia site), how to prevent Flash LSOs from being placed on your device without you being asked, and (for Flash Player 8 and later) how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with the ID Staron website https://www.idstaron.com. We expect our service providers and technology suppliers to honor any decision by you to restrict or limit Flash LSOs, but we cannot guarantee that they will do so.
- Using pixel tags and other similar technologies: Pixel tags (also known as web beacons and clear GIFs) are small images that may be used by us and our service providers in connection with some pages of the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a>, and HTML-formatted email messages to, among other things, render such pages to you on various hardware devices and operating system versions, track the actions of users and email recipients, serve relevant marketing communications to you, measure the success of marketing campaigns and compile statistics about usage and response rates. Pixel tags may collect information such as the pages, features, and links accessed by a user, and the IP address, browser type, and operating system of such user's device.
- Physical location: Our service providers and we may collect the physical location of your device by, for example, using satellite, cell phone tower, or Wi-Fi signals. We may use your device's physical location to provide you with personalized location-based services and content, including for marketing purposes, based on the choices that have been made with respect to such uses. We may also share your device's physical location, combined with information about what advertisements you viewed and other information we collect, with our third-party marketing partners, such as our Promotional Partners, to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns, based on the choices that have been made with respect to such disclosures. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location, but if you choose to deny such uses and/or sharing, we, our service providers, and/or our third-party marketing partners may not be able to provide you with the applicable personalized services and content.
- From you: Our service providers and we may collect demographic information such as your city, state, or zip code of residence, as well as other information, such as your preferred means of communication, your gender, and your date of birth when you voluntarily provide this information to our service providers or
- By aggregating information: Our service providers and we may aggregate Personal Information collected from our customers and potential customers, for example, by using Personal Information to calculate the percentage of such individuals who have a particular telephone area code. Aggregated Personal Information does not personally identify you or any other customer or potential customer of our businesses.

#### HOW WE USE AND DISCLOSE OTHER INFORMATION

We may use and disclose Other Information for any purpose. In some instances, we may combine Other Information with Personal Information (such as combining your zip code with your name). If we combine any Other Information with Personal Information, the combined information will be treated by us as Personal Information while it is so combined.

#### THIRD-PARTIES AND THIRD-PARTY SITES

To the extent that you submit any Personal Information to any third party (for example, JD Staron a third-party software application or service — including any social media service — that is included in, available through, or linked to from the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a>), such third party's collection, use, and disclosure of such information may be governed by its privacy policy, and not by our Privacy Policy. We recommend that you familiarize yourself with the privacy policies and practices of any such third parties.

WE ARE NOT RESPONSIBLE FOR THE INFORMATION COLLECTION, USAGE, DISCLOSURE, OR OTHER PRIVACY PRACTICES OF ANY THIRD PARTIES, INCLUDING OUR AFFILIATES, THIRD-PARTY SERVICE PROVIDERS, ANY THIRD-PARTY SOCIAL MEDIA PLATFORM (SUCH AS FACEBOOK INC.), ANY THIRD PARTY MAKING AVAILABLE THE DEVICES OR OPERATING SYSTEMS FOR WHICH CERTAIN JD Staron WEBSITES IS AVAILABLE (SUCH AS APPLE INC. OR GOOGLE INC.) OR ANY THIRD PARTY OPERATING ANY SITE TO WHICH THE JD Staron WEBSITE CONTAINS A LINK. THE INCLUSION OF A LINK ON THE JD Staron WEBSITE DOES NOT IMPLY ENDORSEMENT OF THE LINKED SITE BY US OR BY OUR AFFILIATES.

#### THIRD-PARTY ADVERTISERS

We may use third-party advertising companies to serve ads when you visit the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a>. Please note that these companies may use information about your visit to the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a>, to provide advertisements about goods and services that may be of interest to you. In the course of serving advertisements to the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a>, these companies may place or recognize a unique cookie on your browser.

#### DO NOT TRACK SIGNALS

We note that the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a>, will continue to operate as described in this Privacy Policy, whether or not a "Do Not Track" signal or similar mechanism is received from your browser.

#### **SECURITY**

We seek to use reasonable organizational, technical, and administrative measures to protect the Personal Information under our control. For example, we seek to use Secure Sockets Layer ("SSL") technology for the placement of orders. Unfortunately, no data storage system or data transmission over the Internet can be guaranteed as 100% secure. Please also be aware that we may use third-party cloud service providers that provide hosting, data storage, and other services pursuant to standard terms and conditions that may be non-negotiable; these service providers have informed us or the general public that they apply security measures they consider adequate for the protection of information within their system, or they have a general reputation for applying such measures.

Please exercise caution when submitting Personal Information on the JD Staron website, especially if you are accessing the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a> using a Wi-Fi hotspot or public network. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any

account that you might have with us has been compromised or if you are unable to utilize our SSL technology in connection with the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a>, please immediately notify us of the problem and place any orders with us over the telephone or in person, instead of using the JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a>. You may contact us in such circumstances in accordance with the "Contact Us" section below.

# YOUR RIGHTS REGARDING OUR USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION

You have certain rights pertaining to our use and disclosure of your Personal Information, regardless of whether such information is collected by us through the JD Staron website https://JD Staronrugs.com or otherwise. While these rights are not absolute, you generally have the right to 1) unsubscribe from promotional and marketing communications, 2) opt-out of our selling your information to third parties, and 3) request deletion of Personal Information when there is no longer a legitimate reason to keep it. You can exercise these rights as follows:

- If you no longer want to receive promotional emails (such as information regarding new products, exclusive offers, and sales events) you may "unsubscribe" from receiving such communications by clicking the "unsubscribe" link in any promotional email; or by contacting us @ J.D. Staron | Contact Us | United States (jdstaron.com) for promotional emails. When contacting us, please include your full name along with the email and/or postal address that you used when registering or making a purchase.
- Our sharing of your Personal Information with Affiliates, Promotional Partners and other third parties for their marketing purposes: If you no longer want us to share your Personal Information on a going-forward basis with our Affiliates, Promotional Partners, and other third parties for their marketing purposes, you may submit a request to opt-out of such sharing by contacting us @ J.D. Staron | Contact Us | United States (jdstaron.com). In contacting us, please include your full name and the contact information that you no longer wish to be shared, and state specifically whether you wish to opt-out of such sharing with (a) Affiliates, (b) Promotional Partners and other third parties, or (c) both. Additionally, we may need to ask for additional information in order to ensure that the Personal Information related to your opt-out request actually relates to you and not some other person.
- Deletion of Personal Information where there is no longer a legitimate reason for us to keep it. If you no longer want us to retain your Personal Information on a going-forward basis, you may submit a request to delete your Personal Information by contacting us @ J.D. Staron | Contact Us | United States (idstaron.com). In contacting us, please include your full name and the contact information that you wish to be deleted, and state specifically whether you wish to opt out of sharing your Personal Information with (a) Affiliates, (b) Promotional Partners, and other third parties, or (c) both. Additionally, we may need to ask for additional information in order to ensure that the Personal Information relating to your deletion request actually relates to you and not some other person. Please Note: There are a number of reasons why JD Staron will retain your Personal Data even if you make a deletion request. Generally, we retain information to comply with legal obligations or to protect or defend our legal rights. However, applicable law also permits the retention of your personal information for our own internal business needs. If we decline to delete data after you have requested deletion, we will respond to you with our reasons and explain how your Personal Information will still be protected so long as we retain it.
- Access or Changing Your Personal Information. We welcome your request to update your information with us. You may submit a request to access or update your Personal Information by contacting us @ J.D. Staron | Contact Us | United States (jdstaron.com). Further, you may ask for a copy of the Personal Information we have collected about you for the last 12 months. In your request, please make clear what information you would like to have changed. Additionally, we may need to ask for additional information in order to ensure that the Personal Information you are accessing actually relates to you and not some other person. We are not responsible for changing information in the databases of Affiliates, Promotional Partners, and other third parties with whom we have already shared your Personal Information. Note that you may not request copies of your Personal Information more than twice a year.

Appointment of an Agent. You have the right to appoint an agent to exercise all your rights under this
Privacy Policy. However, the appointment of an agent is a serious matter, and in the interest of protecting
your privacy, we may require that you not only properly identify yourself and the information that relates
to you but also require that you provide us with sufficient Personal Information about your agent so that
we may identify them as well.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out as described above, we will not be able to remove your Personal Information from the databases of our Affiliates, Promotional Partners, and other third parties with which we have already shared your Personal Information (i.e., to which we have already provided your Personal Information as of the date that we implement your opt-out request). Please also note that if you do opt-out of receiving marketing-related messages from us, we may still send important administrative messages to you, and you cannot opt-out from receiving such administrative messages. For example, when you place an order, we will continue to confirm your order and shipment status by email. We may also need to contact you JD Staron telephone, email, or postal mail with information or questions regarding your order.

# **USE OF THE JD Staron WEBSITE BY MINORS**

The JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a> is not directed to individuals under the age of sixteen (16), and we request that these individuals do not provide Personal Information through the JD Staron website.

## JURISDICTIONAL ISSUES

The JD Staron website <a href="https://www.jdstaron.com">https://www.jdstaron.com</a> is controlled and operated by us from the United States 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.