

Effective date: July 26, 2022

This Privacy Policy (the “Policy”) applies to personal information provided or collected while using the easy-peasy online properties, including our [website](#) and our social media pages or handles (together, the “Services”) operated by Garan, Incorporated. This Policy also applies anywhere it is linked. It does not apply to third-party websites, mobile applications, or services that may link to the Services or be linked from the Services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

If we make changes to this Policy, such changes will be posted in this document on our website. We may change, modify, add, or remove portions of this policy at any time, and any changes will become effective immediately upon being posted unless stated otherwise.

### **1. What information does easy-peasy collect?**

We collect information from you directly, from the devices you use to interact with us, and from third parties. We may combine information from the Services together and with other information we obtain from our business records. We may use and share information that we aggregate (compile to create statistics that cannot identify a particular individual) or de-identify (strip information of all unique identifiers such that it cannot be linked to a particular individual) at our discretion.

Information you provide to us

- Contact information, including name, email address, telephone number, and address.
- Content you may include in survey responses.
- Information contained in your communications to us, including call recordings of customer service calls.
- Information you make available to us via a social media platform. Please be mindful about posting to social media webpages relating to easy-peasy, Garan and/or its employees. We urge anyone posting on social media to be considerate of others, including children, who may read such posts.
- Any information or data you provide by interacting in our online forums and chatrooms, or by commenting on content posted on our Services. Please note that these comments are also visible to other users of our Services.

Information we collect automatically

easy-peasy gathers certain information based upon where you use the Services. We and partners working on our behalf may use log files, cookies, or other digital tracking technologies to collect the following information from the device you use to interact with our Services.

- Device information, including IP address, device identifiers, and details about your web browser.
- Analytical information, including details about your interaction with our website, app, and electronic newsletters.
- Diagnostic information, including web traffic logs.

The following is a list of our partners who collect the information described above. Please follow the links to find out more information about the partner's privacy practices:

- [Adobe Typekit](#): Device information, analytics information, log information, location information
- [Google Tag Manager](#): Device information, analytics information, log information, location information

Information we may collect from other sources

- By clicking any "Shop at Walmart.com" buttons or links, you are immediately directed to Walmart's website. You are then subject to Walmart's privacy policies. Walmart does not share any personally identifiable information or financial information with us. The only information provided by Walmart is point of sale data such as quantity of a particular product sold by location.
- Aggregated data about products purchased from partner websites.

## **2. How does easy-peasy use your information?**

We may use the information we collect from you for the following purposes. Our lawful bases of processing for each of these uses may be consent, our legitimate interests, or to comply with applicable law.

- Service functionality: To provide you with our services and conduct general business operations, such as recordkeeping and audits.
- Service improvement: To improve and grow our Services, including to develop new products and services and understand how our Services are being used, our customer base and purchasing trends, and the effectiveness of our marketing.

- Personalization: To offer you recommendations and tailor the Services to your preferences.
- Advertising and marketing: To send you marketing communications, personalize the advertisements you see on our Services and third-party online properties, and measure the effectiveness of our advertising. We may share your information with business partners, online advertising partners, and social media platforms for this purpose.
- Security: To protect and secure our Services, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
- Legal compliance: To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal requirements.

### **3. How does easy-peasy share your information?**

We may share any of the information we collect with the following recipients.

- Service providers: We engage vendors to perform specific business functions on our behalf, and they may receive information about you from us or collect it directly. Third-party service providers assist us in evaluating our information security controls, maintaining our site, interpreting our site traffic, and contributing services and information to us and to users of our site.
- Social media platforms: If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook “like” button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform. easy-peasy does not receive any information from these social networking sites.
- Government entities/Law enforcement: We may share information when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the safety of our employees, our customers, or other individuals.

- Other businesses in the context of a commercial transaction: We may change our ownership or corporate organization while providing the Services. We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information as described in this policy.

#### **4. What are your choices regarding collection, use, and distribution of your information?**

Email Unsubscribe: You may "opt-out," or unsubscribe from email communications by clicking on the link provided therein or by sending an e-mail to [easypeasycontactus@garan.com](mailto:easypeasycontactus@garan.com) with "unsubscribe" as the subject line. After doing so, you will not receive future promotional emails unless you request to receive them.

Ad Choices: You have options to limit the information that we and our partners collect for online advertising purposes.

- You may disable cookies in your browser or mobile device using their settings menus. Your mobile device may give you the option to disable advertising functionality. Because we use cookies to support Service functionality, disabling cookies may also disable some elements of our online properties.
- The following industry organizations offer opt-out choices for companies that participate in them: the [Network Advertising Initiative](#), the [Digital Advertising Alliance](#), and the [European Interactive Digital Advertising Initiative](#).
- You may contact us directly.

If you exercise these options, please be aware that you may still see advertising, but it will not be personalized. Nor will exercising these options prevent other companies from displaying personalized ads to you. If you delete your cookies, you may also delete your opt-out preferences.

Do Not Track: Your browser or device may include "Do Not Track" functionality. The information collection and disclosure practices and the choices that we provide to you will continue to operate as described in this privacy policy, whether a Do Not Track signal is received.

Jurisdiction-specific rights: You may have certain rights with respect to your personal information depending on your location or residency. Please see "privacy disclosures for specific jurisdictions" below.

## **5. What about children’s privacy?**

In accordance with the Children's Online Privacy Protection Act of 1998, we do NOT solicit or knowingly collect any information from children under the age of 13. If we discover that we have inadvertently collected information from anyone younger than the age of 13, we will delete that information. Please contact us with any concerns.

## **6. Other important information?**

**Security:** We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

**Data Retention:** We may store information about you for as long as we have a legitimate business need for it.

**Cross-border data transfers:** We may collect, process, and store your information in the United States and other countries. The laws in the United States regarding information may be different from the laws of your country. Any such transfers will comply with safeguards as required by relevant law.

## **7. Privacy Disclosures for Specific Jurisdictions**

### **European Economic Area, United Kingdom, and Switzerland**

Our website and Services are intended for United States customers only, but may be accessible outside of the United States. In these instances, we process “personal data,” as that term is defined in the European Union’s General Data Protection Regulation (“GDPR”).

**Your rights under the GDPR:** Users who are located in the European Economic Area (“EEA”), U.K., or Switzerland have the right to lodge a complaint about our data collection and processing actions with the supervisory authority concerned. Contact details for data protection authorities are available here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

If you are located in the EEA, U.K., or Switzerland, you have the following rights.

- **Access and Portability:** Request access to personal data we hold about you or request transmission of your data to a third party.
- **Correction:** Request that we rectify inaccurate or incomplete personal data we store about you.

- Erasure: Request that we erase personal data when such data is no longer necessary for the purpose for which it was collected, when you withdraw consent and no other legal basis for processing exists, or when you believe that your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.
- Restriction of processing: Request that we restrict our processing of personal data if there is a dispute about the accuracy of the data; if the processing is unlawful; if the processing is no longer necessary for the purposes for which it was collected but is needed by you for the establishment, exercise or defense of legal claims; or if your request to object to processing is pending evaluation.
- Objection to processing: Object to processing of your personal data based on our legitimate interests or for direct marketing (including profiling). We will no longer process the data unless there are compelling legitimate grounds for our processing that override your interests, rights, and freedoms, or for the purpose of asserting, exercising, or defending legal claims.
- Transfers: Obtain information about and a copy of the safeguards we use to transfer personal data across borders.

Please contact us to exercise these rights.

### **California Residents' Privacy Rights**

- **California "Shine the Light"/Third Party Marketing:** Residents of the State of California have the right to request information from easy-peasy regarding other companies to whom easy-peasy has disclosed certain categories of information during the preceding year for those other companies' direct marketing purposes. If you are a California resident and would like to make such a request, please use the contact information provided above.
- **California Consumer Privacy Act ("CCPA")**

The California Consumer Privacy Act ("CCPA") provides California residents with rights to receive certain disclosures regarding the collection, use, and disclosure of information about them, as well as rights to know/access, delete, and limit disclosure of personal information. You have the right to be free from discrimination based on your exercise of your CCPA rights. To the extent that we collect personal information that is subject to the CCPA, that information, our practices, and your rights are described below.

Category	Information Type	Source	We disclose to:	We sell to:
Identifiers	<ul style="list-style-type: none"> <li>• Contact information or personal characteristics (name; email address; postal address; telephone number)</li> <li>• Social media handles</li> </ul>	You; our social media pages	Service Providers	Not sold
Geolocation Information	<ul style="list-style-type: none"> <li>• Coarse (information that describes location at ZIP code-level or less precision)</li> </ul>	You; our analytics partners	Service Providers	Not sold
Internet or Electronic Network Activity Information	<ul style="list-style-type: none"> <li>• IP address</li> <li>• Device identifier (e.g., MAC)</li> <li>• Advertising identifier (e.g., IDFA, AAID)</li> <li>• Information provided in URL string (e.g., search keywords)</li> <li>• Cookie or tracking pixel information</li> <li>• Information about your interaction with our website, app, email correspondence, or products</li> <li>• Browsing history</li> <li>• Search history</li> <li>• Diagnostic information (e.g., crash logs, performance data)</li> </ul>	You; our analytics partners	Service Providers	Not sold
Content of Communications	<ul style="list-style-type: none"> <li>• Contents of phone calls, emails, or text messages</li> </ul>	You	Service Providers	Not sold
Contacts	<ul style="list-style-type: none"> <li>• List of contacts that you supply to us</li> <li>• List of contacts we collect from your device with your permission</li> </ul>	You	Service Providers	Not sold

- Categories of personal information we disclose: We may disclose any of the categories of personal information listed above and use them for the above-listed purposes or for other business or operational purposes compatible with the context in which the personal information was collected. Our disclosures of personal information include disclosures to our “service providers,” which are companies that we engage for business purposes to conduct activities on our behalf. The categories of service providers with whom we share information and the services they provide are described above.
  
- Your rights under the CCPA:
  - Opt-out of sale of personal information: We do not sell your personal information.
  
  - Know and request access to and deletion of personal information: You have the right to request access to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers with to whom we sell or disclose it. You also have the right to request in certain circumstances that we delete personal information that we have collected directly from you. Please contact us to exercise these rights.

### **Nevada Resident’s Privacy Rights**

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to third parties. Currently, we do not engage in such sales. If you are a Nevada resident and would like more information about our data sharing practices, please contact us.

### **8. How do I contact easy-peasy with privacy questions, concerns, or to exercise my rights?**

If you have any questions or concerns about this Privacy Policy, the practices of easy-peasy, or your dealings with easy-peasy, please contact us using one of the methods below:

Email: Send a message to [easypeasycontactus@garan.com](mailto:easypeasycontactus@garan.com)

Telephone: 855-792-2091 (toll-free)



Mail:

easy-peasy Privacy Officer

c/o Garan Information Technology

100 Jack Wallace Blvd.

Starkville, MS 39759

Submitting requests: You may request to exercise your rights by making a request using the contact information above.

If you are a California resident, you may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

Verification: We must verify your identity before responding to your request. We verify your identity by asking you to provide personal identifiers that we can match against information we may have collected from you previously. We may need to follow up with you to request more information to verify identity.

We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.