

# Privacy Policy

**Effective Date: September 1, 2018**

## Privacy Policy Overview

This Privacy Policy (the “Policy”) describes how The Simple Greek, LLC (“,” “we,” and “our”) and franchisees collect and use personal information about you when you visit and use our website and services, submit comments and other content to us, place orders with us, and when you correspond or otherwise communicate with us.

In this Policy, “you” means any person who interacts with us, including visiting our website, corresponding with us, or calling us on the phone.

## What Information We Collect

We collect a variety of types of information including:

- **Contact information**, such as your name, address, phone number, and email address;
- **Purchase information**, such as the items you purchase or have made (including sizes), and contact information (such as for receipts or order updates);
- **Preference information**, such as your contact and marketing preferences, and merchandise interests;
- **Account information**, which may include Contact and Preference information as well as your account password, and other information about your account;

- **Financial information**, which may include your net worth and investment capital available, when requesting information on purchasing a franchise;
- **Correspondence information**, including information about and information included in your emails or other written communications with us;
- **Call recordings and voicemail message transcripts**, including information about your call and information you share when you call us on the phone or leave us a voicemail; and
- **Device and browsing information**, including information about your phone, tablet, computer, or other device, and online browsing activity (collectively, “automatically collected information”). Automatically collected information may include IP addresses, unique device identifiers, cookie identifiers, device and browser settings and information, and Internet service provider information. Automatically collected information also may include information about when and how you access and use our website, such as the date and time of your visit or use, the website you visit before coming to and after leaving our website, how you navigate and what you search for using our website, the website pages and items you view using our website, and the items you purchase.

## **How We Collect Information**

We collect information on our website and through email and other communications and interactions with you. We also obtain information from you and from third parties. We collect and obtain information:

- **You provide**, such as when you make a purchase, visit or use our website, place an order with us, contact us, register for an online account, participate in a contest or sweepstakes, respond to a survey,

engage in a promotional activity, apply for employment, request information regarding purchasing a

franchise, or sign up for emails or marketing;

- **From the Simple Greek family of brands and companies**, as well as our other affiliates, parents, and subsidiaries with whom you have interacted;
- **From third parties**, such as service providers that we use, analytics companies, advertising networks and cooperatives, demographic companies, third parties that provide us with information about you and the different devices you use online, and other third parties that we choose to collaborate or work with;
- **From social media platforms and networks** that you use in connection with our website or that share or allow you to share information with us, such as Facebook, Twitter, Pinterest, and Instagram. For example, if you use functionalities, plugins, widgets, or tools from social media platforms or networks in connection with our website (for example, to share purchases and other content from our website with your friends and followers on social media), we will collect the information that you share with us, or that those social media platforms or networks share with us. For more information about social media platform and network privacy practices, please review the privacy policies and settings of the social media platforms and networks that you use;
- **Using cookies and other automatic collection methods.** For example, we and third parties we work with may collect information from the computer, tablet, phone, or other device that you use to access our website, or that you use to open an email or click on an advertisement from us. This collection includes automatically collected information, and generally does not include personal information that directly identifies you unless you provide it

through our website or you choose to share it with us. Automatic collection methods we use include:

- **Cookies**, which are small text files that many websites automatically download to a user's computer or other device when they browse online. Cookies are often used to collect standard Internet log information and visitor behavior data. We use cookies to personalize content and ads, to provide social media features and to analyze our website traffic. We also share information about your use of our website with our social media, advertising and analytics partners. The cookies that our website uses may include both session-based cookies and persistent cookies (which remain on your computer or other device after your browsing session has ended). For more information about cookies, including how to manage them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org);
- **Web beacons or tags**, which are small images embedded into websites or emails that send information about your computer, tablet, phone, or other device when you visit our website, or open an email we send to you;
- **Website log files**, which we or our service providers tend to create automatically in connection with access to and use of our website;
- **Flash cookies or Local Stored Objects**, which may be placed using Adobe Flash software. You can learn more about privacy and storage settings for Flash cookies [here](#); and
- **Other technologies**, which may be similar to or different than the methods noted above.

## **How We Use Information**

We use the information that we collect and obtain to conduct our business and to provide you with the products, services, and experiences that you request or that we think may be of interest to you. We also may combine any or all of the information that we collect or obtain with other information that we collect or obtain, including but not limited to information obtained from third parties with which we choose to work. We use information:

- **To provide you with products and services**, fulfill your orders and process your payments, process, maintain and service your account, process and remit royalty payments to qualifying designers, and to provide you with products and services that you request or that we think may be of interest to you;
- **To respond to you**, when you place an order, request information regarding purchasing a franchise, correspond with us by email or otherwise communicate with us, make a request or inquiry, enter a contest or sweepstakes, complete a survey; or share a comment or concern;
- **For personalization** of your experiences with us, including to remember your interests and preferences, personalize website content, customize the products and services we share with you, track and categorize your activity and interests on our website (including by identifying the different devices you use), and to enrich your experience on our website;
- **To provide social media features**;
- **For marketing and advertising**, to send you marketing and advertising communications, to segment and build audiences and engage in interest-based advertising, and to personalize the marketing and advertising that we show you (for choices about marketing and advertising, see the “Your Choices” Section below);
- **For analytics**, to understand how you use our website, analyze our website traffic, understand how you shop with us, determine the methods and devices used to access our website, and improve our website and associated products and services;

- **For our business purposes**, to operate and improve upon our business and lawful business activities, to maintain our programs, accounts, and records, for research, to determine your satisfaction with our products and services, to detect and prevent fraud or misuse of our services, to enforce, apply or comply with any of our terms or policies, including but not limited to this Policy, and for any other business purpose that is permitted by law;
- **For legal, contractual, and safety purposes** to defend or protect us, our customers, you, or third parties from harm or in legal proceedings; protect our rights; protect our security and the security of our customers, employees, and property; respond to court orders, lawsuits, subpoenas, and government requests; address legal and regulatory compliance; verify your identity or communications from you; comply with contracts and other agreements to which we are a party; notify you of changes to our terms, policies and practices; and notify you of product recalls or safety issues.

## **How We Share Information**

In general, we do not share personal information about you with non-affiliated third parties for their own direct marketing or advertising purposes unless you request or consent to such sharing, or as otherwise described below. We do share personal information with third parties for other purposes. We share personal information with:

- **The Simple Greek, LLC family of brands and companies**, and our other affiliates, parents, and subsidiaries;
- **Third parties and service providers** that provide products or services to us, that help us market or advertise to you (including co-branded marketing and advertising), or that provide products or services to you, including our advertising and analytics partners (see “Online Advertising, Analytics, and Other Partners We Work With” section below for more information). We may use third parties or service providers to

perform any of the actions or activities allowed under this Policy;

- **Social media platforms and networks**, such as [Facebook](#), [Twitter](#), [Instagram](#), [Pinterest](#), [YouTube](#), [Google+](#), and [Instagram](#) that offer functionalities, plugins, widgets, or tools in connection with our website (for example, to share purchases and other content from our website with your friends and followers on social media). If you choose to use these functionalities, plugins, widgets, or tools, certain information will be shared with or collected by those social media companies. For more information about what information is shared or collected, and how it is used, and information about privacy settings on those social media platforms, please see the applicable social media company's privacy policy;
- **Parties to our business transactions**, such as those we deal with in mergers, acquisitions, joint ventures, sales of assets, reorganizations, divestitures, dissolutions, bankruptcies, liquidations, or other types of business transactions. In these types of transactions, personal information may be shared, sold, or transferred, and it may be used subsequently by a third party; and
- **Additional third parties**, such as law enforcement, government entities, courts, our legal advisors, or other third parties as required or allowed by applicable law, such as for the legal and safety purposes described under the "How We Use Information" Section above, or otherwise to help prevent harm or fraud to us, you, our customers, or other third parties. We also may share personal information with third parties upon your request or with your consent, although we may not be able to accommodate all requests.

## **Online Advertising, Analytics and Other Third Parties We Work With**

We work with third-party companies for measurement, analytics and

advertising purposes, including to: measure website activity; track conversions; target and serve advertisements across the Internet; track and categorize your activity and interests over time on our website and on third-party websites and mobile applications; build a profile of your apparent interests and show you ads on other websites that may be relevant to your apparent interests; and to identify the different device(s) you use to access websites and mobile applications. We share information with these companies, and these companies may collect information, including automatically collected information, when you use our website through the methods described in the “How We Collect Information” Section above (see “Using cookies and automatic collection methods”). These third-party companies also may possess or obtain information about you from your interactions directly with the third-party companies, with other websites, mobile applications, or other companies that the third-party companies work with, or from your interactions with advertisements the third-party companies help to display to you. The information that these companies collect or that we share may be used to customize or personalize the advertisements that are displayed to you. We may share personal information with the third-party companies we work with for our purposes, though in general we do not share personal information that directly identifies you with third parties for those third-parties’ marketing or advertising purposes unless you request or consent to such sharing and use, or as otherwise described in this Policy. We may also share other information in our discretion, including automatically collected information, which may be used by third parties for third-party marketing, advertising, and other purposes. For information about the choices you have about the online advertising practices described in this section, please see the “Your Choices and Access Requests” Section below.

The Facebook pixel is installed on certain pages of our website. The Facebook pixel is a tool that allows us to measure the effectiveness of our ads by understanding the actions taken on our website. We use the data collected through the Facebook pixel to measure ad conversions, make sure that our ads are shown to the right people, build advertising and custom audiences, and retarget ads shown to you on Facebook and Instagram. For more information on the Facebook pixel, click [here](#). We also use personal information to

create custom audiences to tailor the ads that are shown to you on Facebook and Instagram. We share information (other than Facebook pixel data) with

Facebook through hashing technology. For more information about how Facebook uses and shares information, see its [Privacy Policy](#) and [Cookies Policy](#). For more information about how to control the ads you see on Facebook and how to manage your ad settings and preferences, click [here](#). For more information about how to control ads that are shown to you based on your activity off of Facebook, click [here](#).

We use Google Ads to serve ads to you on the Google ad network. For more information about Google Ads and how it collects and processes data, click [here](#). For more information about how Google Ads uses cookies and other technologies to personalize ads, click [here](#). Google's ability to use and share information collected by Google Ads is restricted by Google's [Terms of Service](#) and [Privacy Policy](#). If you would like to learn more about how to manage your Google Ad Settings to opt-out of receiving personalized ads served by Google, click [here](#). Click [here](#) if you would like to learn more about how you can install a browser plugin to maintain your preference to opt out of personalized ads from Google, even if you've cleared your cookies.

We use Google Analytics to measure and report how users interact with our website, emails and advertisements to analyze the traffic to our website and for the other purposes set forth in the "How We Use Information" Section above. For more information about Google Analytics and how it collects and processes data, please see "[How Google Uses Data When You Use Our Partners' Sites or Apps](#)." For more information about how Google Analytics uses cookies to measure user interactions on websites, click [here](#). Google's ability to use and share information collected by Google Analytics about your visits to the Site is restricted by Google's [Terms of Service](#) and [Privacy Policy](#). If you do not want your website visit data reported by the Google Analytics JavaScript, you can install the Google Analytics opt-out browser add-on. This add-on instructs the Google Analytics JavaScript to prohibit sending visit information to Google Analytics, but does not prevent information from being sent to the website itself or in other ways to other website analytics services. Click [here](#) if you would like to learn more about the Google Analytics opt-out browser add-on, and click [here](#) to install the opt-out browser add-on.

## **Your Choices and Access Requests**

We offer you choices about how certain personal information is used and shared. Your choices include:

- **Online Advertising.** In addition to using the management tools linked-to in the “Online Advertising, Analytics, and Other Third Parties We Work With” Section above, you can manage third-party advertising preferences for some of the third parties we work with to serve advertising across the Internet by utilizing the choices available at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) and <http://www.aboutads.info/choices>. For mobile users, you also have numerous controls in your Operating System that enable you to choose whether to allow cookies, or share your advertising ID with third parties. For some information on controlling your mobile choices, click [here](#). To help control or block certain ads in mobile applications, you may choose to download and utilize the Digital Advertising Alliance’s mobile app by clicking [here](#). We do not guarantee that all of the third parties we work with will honor the elections you make using those options.

- **Social Media Platforms and Networks.** We encourage you to review your privacy options and settings with the social media platforms and networks you use to understand what choices you have about sharing information from those platforms and networks with us.
- **Email Choices.** You can opt out of marketing or advertising emails by utilizing the “unsubscribe” link or mechanism noted in marketing or advertising emails you receive from us. You also can request to opt out of marketing or advertising emails by contacting us through one of the methods specified in the “Additional Information and Contacting Us” Section below, and sharing the email address at which you are receiving marketing or advertising emails. Please note that opting out of receiving marketing or advertising emails from us will not apply to transactional communications or legal notices, for example, emails about your orders or about changes to our terms, policies and business practices.
- **Managing Cookies.** You can activate settings on your Internet browser to refuse the setting of some or all cookies. In addition, the websites linked to below will tell you how you can remove existing cookies from

your browser if you wish. Please keep in mind, however, that if you use your Internet browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website and services. For further information about managing cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org). Please note that disabling or clearing cookies also may affect cookie-based opt-outs by either preventing you from using such cookie-based opt-outs or clearing opt-outs that you have previously set, in which case you would have to revisit the applicable pages and renew your opt-out after clearing cookies. You can learn more about privacy and storage settings for Flash cookies [here](#).

- **Mobile Devices.** Your mobile device may offer settings relating to cookies, pixel tags, Flash cookies, and other similar technologies. We encourage you to visit your device's help menu to learn about your options to limit tracking when using your device.
- **Access Requests.** If you have registered for an online account on the Simple Greek website, we allow you to access and update certain personal information that you have provided to us by logging into your account and using the features and functionalities available there. You may also make a request for access to personal information by sending an email or writing to us at the address specified in the "Additional Information and Contacting Us" section below. We are not able to grant all access requests, and we may request additional information from you in order to verify your identity before accommodating an access request.

## Security and Retention

We take steps to help protect the security of personal information you share with us through our website, but information transmitted through the Internet may not be perfectly secure. We do not guarantee the security of your personal information. We will keep your personal information for as long as necessary for the purposes for which it was collected, to provide you with products or

services, to carry out legitimate business interests, and where otherwise required or permitted by law.

## **Links to Other Websites and Services**

Our website may provide links to other Internet sites, content or videos (embedded or direct links) maintained by third parties, including our payment processor, Vantiv. We are not responsible for the sites, content, or videos accessed via the links, and we have not reviewed the privacy practices of those third parties. We encourage you to review the privacy practices of those third parties. For information on Vantiv’s Privacy Policy, please click [here](#).

## **Do Not Track Signals**

Some browsers have incorporated “Do Not Track” (DNT) features that can send a signal to the websites you visit indicating that you do not wish to be tracked. There is not yet a common understanding of how to interpret the DNT signal. We currently do not respond to web browser DNT signals. For information about the choices you have about limiting how you are tracked online (for example, for advertising practices described in this Policy), please see the “Your Choices and Access Requests” Section above.

## **Your California Privacy Rights**

Once per calendar year, California Civil Code Section 1798.83 provides California residents with the right to receive: (a) information identifying (names and addresses) any third party(ies) to whom we may have disclosed, within the preceding calendar year, certain of your personal information for that third party’s direct marketing purposes; and (b) a description of the categories of personal information disclosed, as required under this law. To request such information, please email us at [info@thesimplegreek.com](mailto:info@thesimplegreek.com), or write to us at:

The Simple Greek, LLC  
794 Penllyn Blue Bell Pike, Suite 219 Blue Bell, PA 19422  
Attn: CA Privacy Rights.

If you are a California resident under the age of 18, and have a registered account on the Simple Greek website, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to [info@thesimplegreek.com](mailto:info@thesimplegreek.com). Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted, and that there may be circumstances in which the law does not require or allow removal even if requested.

## **Children's Privacy**

Our website is not directed to or intended to be used by individuals under the age of 13. We do not knowingly request or collect personal information from any person under 13 years of age without prior verifiable parental consent. If you believe that your child under the age of 13 has submitted personal information to us in connection with our website, and without prior verifiable parental consent, please email us at [info@thesimplegreek.com](mailto:info@thesimplegreek.com) that we can take steps to delete the personal information that she or he provided as required in accordance with applicable law.

## **International Users**

If you provide personal information through our website, you agree that the personal information will be transferred to and processed in the United States of America and any other country or jurisdiction at our sole discretion. The laws that apply to the use and protection of personal information in the United States or other countries or jurisdictions in which we transfer or process personal information may be different than the laws and protections in your country.

## **Additional Information and Contacting Us**

If you have questions about this Policy or our privacy practices, please contact us by email at [info@thesimplegreek.com](mailto:info@thesimplegreek.com) or write to us at:

The Simple Greek, LLC  
794 Penllyn Blue Bell Pike, Suite 219 Blue Bell, PA 19422

## **Updates to This Policy**

We may make changes to this Policy, and may apply any changes to information previously collected, as permitted by law. When we make material changes to this Policy, we will notify you by posting the updated Policy on our website and/or by other means, and we will update the effective date at the top of this Policy. By continuing to use our website after being notified of material changes to this Policy, you agree that the terms of this Policy as of the effective date will apply to information previously collected or collected in the future.

**Please click [here](#) to review our Terms of Service.**