

PRIVACY POLICY

Last updated October 23, 2019

Thank you for choosing to be part of our community at Fleurs de Villes Inc. We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our notice, or our practices with regards to your personal information, please contact us at info@fleursdevilles.com.

When you visit our website www.fleursdevilles.com, and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Sites and our services.

This privacy notice applies to all information collected through our website www.fleursdevilles.com (including the information collected if you choose to sign up to Fleurs de Villes e-newsletters, and/or enter any of our 'vote for your favourite mannequin' contests), and information collected at Fleurs de Villes events (we refer to them collectively in this privacy notice as the "Services").

Please read this privacy notice carefully as it will help you make informed decisions about sharing your personal information with us.

1. How do we use your information?

We use personal information collected via our Services for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive to:

- To send you marketing and promotional communications (where you have agreed to this). We may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time by hitting the unsubscribe link within the email.
- Administer prize draws and contests. We may use your information to administer prize draws and contests when you elect to participate in these. Each Fleurs de

Villes contest is governed by different contest terms & conditions. Entrants can review and must agree to these before submitting an online entry form, or if choosing to complete and submit a printed ballot, the URL for these terms & conditions will be noted on the printed ballot.

2. Will your information be shared with anyone?

We may process or share data based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Services, which will enable them to collect data about how you interact with the Services over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition

of all or a portion of our business to another company.

3. How long do we keep your information?

We will hold your personal information on our systems indefinitely unless requested to opt out.

4. Do we collect information from minors?

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at info@fleursdevilles.com.

5. Do we make updates to this policy?

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

6. Contacting Fleurs de Villes:

If you have questions or comments about this policy, or would like to send a request to review, update, or delete your personal information, please email us at info@fleursdevilles.com.