

## PRIVACY POLICY

This Privacy Policy describes how XPRESSPILL (the "Site" or "we") collects, uses, and discloses your Personal Information when you visit or make a purchase from the Site and Mobile App.

### Collecting Personal Information

We collect certain information about your device, your interaction with the Site, and information necessary to process your purchases. We may also collect additional information if you contact us for customer support. In this Privacy Policy, we refer to any information that can uniquely identify an individual (including the information below) as "Personal Information". See the list below for more information about what Personal Information we collect and why.

#### Device information

- Examples of Personal Information collected: version of web browser, IP address, time zone, cookie information, what sites or products you view, search terms, and how you interact with the Site.
- Purpose of collection: to load the Site accurately for you, and to perform analytics on Site usage to optimize our Site.
- Source of collection: Collected automatically when you access our Site using cookies, log files, web beacons, tags, or pixels ~~[ADD OR SUBTRACT ANY OTHER TRACKING TECHNOLOGIES USED].~~
- ~~Disclosure for a business purpose: shared with our processor Shopify [ADD ANY OTHER VENDORS WITH WHOM YOU SHARE THIS INFORMATION].~~

#### Order information

- Examples of Personal Information collected: name, billing address, shipping address, payment information (including credit card numbers, health card, insurance cards, third party coverage information, age, gender, date of birth, medication history, medical history, allergies, personal health information, email address, and phone number.
- Purpose of collection: to provide products or services to you to fulfill our contract, to process your payment information, arrange for shipping, and provide you with invoices and/or order confirmations, communicate with you, screen our orders for potential risk or fraud, and when in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.
- Source of collection: collected from you, authorized person or power of attorney.

### Minors

The Site is not intended for minor individuals defined under provincial, territory law. We do not intentionally collect Personal Information from children. If you are the parent or guardian and believe your child has provided us with Personal Information, please contact us at the address below to request deletion.

### Sharing Personal Information

We share your Personal Information with service providers, health professionals, to help us provide our services and fulfill our professional responsibilities and contracts with you, as described above.

### Behavioural Advertising

As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For example:

- We use Google Analytics to help us understand how our customers use the Site or Mobile app. You can read more about how Google uses your Personal Information here: <https://policies.google.com/privacy?hl=en>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.
- We share information about your use of the Site, your purchases, and your interaction with our ads on other websites with our advertising partners. We collect and share some of this information directly with our advertising partners, and in some cases through the use of cookies or other similar technologies (which you may consent to, depending on your location).

For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt out of targeted advertising by:

[INCLUDE OPT-OUT LINKS FROM WHICHEVER SERVICES BEING USED. COMMON LINKS INCLUDE:

- FACEBOOK - <https://www.facebook.com/settings/?tab=ads>
- GOOGLE - <https://www.google.com/settings/ads/anonymous>
- BING - <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>]

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

### Using Personal Information

We use your personal Information to provide our services to you, which includes: professional care, offering products for sale, processing payments, shipping and fulfillment of your order, and keeping you up to date on new products, services, and offers.

### Lawful Basis

Pursuant to the General Data Protection Regulation (“GDPR”), if you are a resident of the European Economic Area (“EEA”), we process your personal information under the following lawful bases:

- Your consent;
- The performance of the contract between you and the Site;
- Compliance with our legal obligations;
- To protect your vital interests;
- To perform a task carried out in the public interest;
- For our legitimate interests, which do not override your fundamental rights and freedoms.

### Retention

When you place an order through the Site, we will retain your Personal Information for our records unless and until you ask us to erase this information. For more information on your right of erasure, please see the ‘Your rights’ section below.

### Automatic decision-making

If you are a resident of the EEA, you have the right to object to processing based solely on automated decision-making (which includes profiling), when that decision-making has a legal effect on you or otherwise significantly affects you.

We do engage in fully automated decision-making that has a legal or otherwise significant effect using customer data.

Services that include elements of automated decision-making include:

- Temporary deny list of IP addresses associated with repeated failed transactions. This deny list persists for a small number of hours.
- Temporary deny list of credit cards associated with deny listed IP addresses. This deny list persists for a small number of days.

### GDPR

If you are a resident of the EEA, you have the right to access the Personal Information we hold about you, to port it to a new service, and to ask that your Personal Information be corrected, updated, or erased. If you would like to exercise these rights, please contact us through the contact information below

Your Personal Information will be initially processed in Ireland and then will be transferred outside of Europe for storage and further processing, including to Canada and the United States. For more information on how data transfers comply with the GDPR, see Shopify’s GDPR Whitepaper:

<https://help.shopify.com/en/manual/your-account/privacy/GDPR>.

## CCPA

If you are a resident of California, you have the right to access the Personal Information we hold about you (also known as the 'Right to Know'), to port it to a new service, and to ask that your Personal Information be corrected, updated, or erased. If you would like to exercise these rights, please contact us through the contact information below

If you would like to designate an authorized agent to submit these requests on your behalf, please contact us at the address below.

## Cookies

A cookie is a small amount of information that's downloaded to your computer or device when you visit our Site. We use a number of different cookies, including functional, performance, advertising, and social media or content cookies. Cookies make your browsing experience better by allowing the website to remember your actions and preferences (such as login and region selection). This means you don't have to re-enter this information each time you return to the site or browse from one page to another. Cookies also provide information on how people use the website, for instance whether it's their first time visiting or if they are a frequent visitor.

We use cookies to optimize your experience on our Site and to provide our services.

The length of time that a cookie remains on your computer or mobile device depends on whether it is a "persistent" or "session" cookie. Session cookies last until you stop browsing and persistent cookies last until they expire or are deleted. Most of the cookies we use are persistent and will expire between 30 minutes and two years from the date they are downloaded to your device.

You can control and manage cookies in various ways. Please keep in mind that removing or blocking cookies can negatively impact your user experience and parts of our website may no longer be fully accessible.

Most browsers automatically accept cookies, but you can choose whether or not to accept cookies through your browser controls, often found in your browser's "Tools" or "Preferences" menu. For more information on how to modify your browser settings or how to block, manage or filter cookies can be found in your browser's help file or through such sites as [www.allaboutcookies.org](http://www.allaboutcookies.org).

Additionally, please note that blocking cookies may not completely prevent how we share information with third parties such as our advertising partners. To exercise your rights or opt-out of certain uses of your information by these parties, please follow the instructions in the "Behavioral Advertising" section above.

#### Do Not Track

Please note that because there is no consistent industry understanding of how to respond to “Do Not Track” signals, we do not alter our data collection and usage practices when we detect such a signal from your browser.

#### Changes

We may update this Privacy Policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons.

If you are not satisfied with our response to your complaint, you have the right to lodge your complaint with the relevant data protection authority. You can contact your local data protection authority, or our supervisory authority here. We have a 30-day return policy for non-prescription products only, which means you have 30 days after receiving your item to request a return.

To be eligible for a return, your item must be in the same condition that you received it, unworn or unused, with tags, and in its original packaging. You’ll also need the receipt or proof of purchase. Please inspect your order upon reception and contact us immediately if the item is defective, damaged or if you receive the wrong item, so that we can evaluate the issue and make it right.

You can always contact us for any return question at [xpresspill@outlook.com](mailto:xpresspill@outlook.com).

#### Liabilities

XPRESSPILL, will not be liable in any event or condition for any direct, indirect, unrelated, essential, correctional, or exemplary damages that may have result from the use of XPRESSPILL APP or Services offered by us.

#### Exceptions / non-returnable items

Certain types of items cannot be returned, like prescription drugs, perishable goods (such as food, flowers, or plants), custom products (such as special orders or personalized items), and personal care goods (such as beauty products). We also do not accept returns for hazardous materials, flammable liquids, or gases. Please get in touch if you have questions or concerns about your specific item.

#### Exchanges

The fastest way to ensure you get what you want is to return the item you have, and once the return is accepted, make a separate purchase for the new item.

#### Refunds

We will notify you once we’ve received and inspected your return, and let you know if the refund was

approved or not. If approved, you'll be automatically refunded on your original payment method. Please remember it can take some time for your bank or credit card company to process and post the refund too.

#### Contact

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at [email address] or by mail using the details provided below:

Unit 1A, 3550 Schmon Parkway, First Floor, Thorold ON L2V 4Y6, Canada

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