Privacy Policy

This Privacy Policy (this "Policy") describes the privacy practices of TruShine Cleaning with respect to information collected when you sign up for, use, access or otherwise interact with www.trushinecleaning.com (the "Site") and any online services and products of TruShine Cleaning, including mobile applications and websites or applications operated by TruShine Cleaning and connected products and services (collectively, including the Sites, the "Services") that reference this Policy, and how we use and share that information. By using the Services (including the Sites) you consent to the terms of this Policy.

You can reach us at support@trushinecleaning.com if you have further questions.

BY USING THE SERVICES, YOU CONSENT TO THE COLLECTION, USE AND TRANSFER OF YOUR PERSONAL DATA FOR PROCESSING AS DESCRIBED IN THIS PRIVACY POLICY.

Personal Data we collect may be stored and processed in Canada, the United States or any other country in which TruShine Cleaning or its affiliates, subsidiaries, agents, or thirdparty service providers maintain facilities and/or infrastructure, and by using the Services and submitting information to us, you consent to the transfer, processing, and storage of such information outside of your country. Note that Canada is a jurisdiction in which the data protection regime may not provide the same level of security as those in the nation where you reside. Unless applicable law requires different security and protections to be applied in any given relevant jurisdiction, we apply the same principles in using, handling, and transmitting data as described in this Privacy Policy in all our operations. If you do not agree with any part of this Privacy Policy or our Terms and Conditions, please do not access or continue to use any of the Services or otherwise provide your Personal Data.

This Policy covers the following areas:

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Call or Text: 703-594-9997

Email: support@trushinecleaning.com

Visit our website: <u>https://trushinecleaning.com</u>

I. Information We Collect

TruShine Cleaning collects information from users in connection with the Services. We collect both Personal Data and Non-Personal Information. "Personal Data" means information that relates to you and identifies you personally, either alone or in combination with other information available to us. Examples of Personal Data are a name, an online identifier, a contact address, social media reviews and ratings, and precise Location Data. "Non-Personal Information" means information that is aggregate, anonymous, practicably de-identified, or otherwise does not reveal your identity. Some examples could include age, annual income, gender, browser, IP addresses, hardware model, operating system and version, time spent using our Services, web pages visited, and advertising identifiers (such as the Apple Identifier for Advertising (IDFA) and Google Advertising ID (AAID)).

We collect your Personal Data and Non-Personal Information as follows:

1. If you register for a TruShine Cleaning account, install, or use our mobile apps, or place an order, we collect directly or indirectly (such as through a third-party application) certain registration and demographic details (e.g., name, username and password, email address, phone number, date of birth, personal interests, and location (e.g., country) and other similar details ("Account Information").

2. When interacting with our Services, data is automatically collected by the technology platforms providing the experiences, including without limitation information about the Sites that you visit an how you use them and any GPS-based, Wi-Fi-based, or cell-based location information ("Location Information"), and any other identifier that permits direct identifying, locating, or contacting of the device or user. Your web browser or mobile device may share certain data with TruShine Cleaning as those devices interact with TruShine Cleaning"s Sites or mobile apps. This data includes: Device IDs, network access, storage information and battery information as well as cookies, IP addresses, referrer headers, data identifying your web browser and version, the date and time of the visit and how long you remained on our Sites, and web beacons and tags. Location Data may include the presence of the device, its signal strength and mobile network information, its manufacturer (Apple, Samsung, etc.) and model, and information about the device's interaction with other information collected in connection with your use of the Services. More information about these practices is included in the Cookies and Other Data Collection Tools section below.

3. If you engage with us through a social media account, we may collect account or profile information associated with that account. To the extent you connect an account managed by third parties such as social media sites (e.g., Facebook) with a TruShine Cleaning

account, you authorize TruShine Cleaning to have access to information related to that account (as permitted by the terms of service of your account with that social media site) and agree that TruShine Cleaning may collect, store and use such information in accordance with this Policy.

4. If you are accessing third-party products and services that we have made available to you via the Services, we may collect your name, email address, city, payment information, and more, in connection with your registration for and access to those products and services.

5. When you purchase or browse TruShine Cleaning products online, we collect purchase and browsing data. As you browse our products online or submit product inquiries, we may collect Personal Data such as your contact information and your specific requests. We also may collect information regarding a completed purchase (payment amounts and methods, billing and shipping information, returns and other transaction information). Non-Personal Information relating to your browsing of our products (such as browsing order and products removed from a shopping cart) may also be collected. We may associate purchase and browsing information to an account you have registered with us and combine it with information relating to all interactions with us.

6. When you shop at TruShine Cleaning pop-up stores, we may collect contact and purchase information. When you are shopping at a TruShine Cleaning pop-up store we collect any contact and purchase information that is necessary to process your transaction. For example, we may collect payment information and email address (to provide e-receipts). In addition, if you consent and where permissible, we may collect your email and phone number(s) in order to send you information about products and Promotions.

7. If you participate in or utilize, as applicable, contests, sweepstakes, loyalty programs, surveys, discounts, or promotional sales ("Promotions") being offered by TruShine Cleaning, we may collect contact, demographic and eligibility information or other Personal Data. In such instances, Personal Data may be collected directly by and/or shared with TruShine Cleaning, the service provider and/or business partner via print, website, mobile applications or other means. Personal Data associated with a Promotion may be shared with partners that sponsored or were involved with the Promotion.

8. We collect Personal Data relating to your interactions with advertising on the Services or TruShine Cleaning online communities. We may collect your Personal Data when you click on advertisements, submit content, make reviews, interact with our social media pages, or otherwise contribute to message boards, comment fields, blogs, and other media forums sponsored by or affiliated with TruShine Cleaning.

9. We allow our trusted ad partners to collect information about you when you use our Services. These companies may collect information from you (e.g. subject of advertisements clicked or scrolled over) during your visits to the Services in order to provide advertisements about goods and services likely to be of interest to you. Our ad partners may use the data they collect from you for a variety of other purposes, including (a) in conjunction with advertising that appears on other websites, (b) to determine the popularity of certain content and analyze and track website traffic, statistics, advertisement data and other interaction with ads and the websites on which they are served, and (c) to measure the effectiveness of web-based and email ads. The ad partners that we engage are bound by confidentiality obligations and other restrictions with respect to their use and collection of your information.

II. How We Use Your Information

We use the information we collect to:

1. Provide our products and services and customer support.

We use Personal Data and Non-Personal Data to process and deliver product orders and to notify you of the status of your order. Additionally, this data may be used to troubleshoot problems with your experience with the Services. If you contact our customer service (or vice versa), we will use Personal Data such as your order information and contact history to process your request and provide you with the best service possible.

2. Customize experiences on our Services and gain insights into our customers and communities.

We use Personal Data and Non-Personal Data to present products and content tailored to you, your interests and location. Our use of Personal Data may also help you engage with other users of our Services. We also use Personal Data to better understand our customers and other individuals who access our Services which helps us develop more interesting and relevant products and services and to improve our Services.

3. Promote TruShine Cleaning's business through direct mail and online advertising and marketing activities to you and others.

We use Personal Data and Non-Personal Information in connection with advertising and online and offline marketing campaigns, to provide you with information on the products and Services that we think are most relevant to or appropriate for you and to track the success of our marketing activities. We display ads on the online platforms that we own and operate. We also use third party ad partners to display ads for TruShine Cleaning on third party websites and apps ("Retargeting"). Retargeting technologies analyze the information collected about your interactions with TruShine Cleaning Sites as described in relation to marketing above and information about you obtained from reputable third-party sources parties, including your cookies, and display advertisements matched to your interests, as inferred from your online activities. Ads may also be based on the content of the pages on which they appear, and Location Data may be used to serve ads that are more relevant to you based on your particular location. For most devices, you can control the interest-based ads you see as a result of Retargeting by changing the privacy settings of the device itself or changing the privacy settings of your browser but note that our Sites generally are not configured to respond to web browser do-not-track signals.

4. Connect you with third-party products and services.

We use the data we collect to provide third parties with the information required to enable those third parties to fulfill products or services that a TruShine Cleaning user has ordered.

5. Communicate with you.

If you have created an account with us, and consent to receiving messages from us via electronic communications, we may use Personal Data and Non-Personal Information to contact you about the TruShine Cleaning products or Services you have purchased or used and to notify you of other products, promotions, and Services we think may be of interest to you. We may use your information to respond to requests for support, online services, product information or to any other interaction you initiate. We also may use your Personal Data to notify you of promotions and other special offers. Irrespective of your privacy settings, we may send you notifications pertaining to the performance of our Services, such as revision of our Terms or this Privacy Policy or other formal communications relating to products or Services you have purchased or use.

6. Administer Promotions.

In connection with Promotions, we may use Personal Data to verify identity, communicate with you about the Promotion or about other offers, conduct market research, and ask you questions relating to the Promotion. If you participate in questions and surveys regarding the Promotion, we may share your responses with business partners for their own market

research and communication purposes. To opt-out of this kind of collection and sharing, you can decline to answer these kinds of questions or decline to participate in the challenge or survey altogether.

7. Operate and analyze our business.

We use Personal Data and Non-Personal Information to analyze trends and statistics and otherwise monitor usage and performance of the Services, engage in business transactions, including the purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, securitization or financing involving TruShine Cleaning, comply with any applicable legal or regulatory requirements, and for sales, supply chain and financial analysis purposes.

8. Resolve security issues and disputes.

We use the data we collect from you to protect the integrity of our Services, employees and users, to identify and prevent error, negligence and fraud, to audit compliance with and enforce our agreements (such as terms of use, terms of sale and this Privacy Policy), and to resolve disputes.

9. We may augment Personal Data we collect from you with information provided by reputable third-party sources.

We may combine Personal Data with information we receive from joint marketing partners, public databases, publicly available pages on social media platforms and other third parties, to give us better consumer insight into your needs, help us tailor our communications with you, deliver marketing messages to you and improve our business. For example, we may obtain updated email address information from email-change-of-address vendors or purchase third-party marketing data and address information and add it to our database to send you offline marketing materials, better direct our advertising and provide pertinent offers we think you are more likely to be interested in. You can opt-out of us combining your personal information with the information lawfully collected from third parties by contacting us using the contact details set out below.

III. How We Share Your Information

TruShine Cleaning will share your Personal Data and Non-Personal Information with third parties in the following ways:

1. To Partners and Suppliers.

TruShine Cleaning may (a) coordinate the provision of services and products to you through third party service providers and (b) partner with third parties in order to promote, support, enable or expand TruShine Cleaning's business and products and services or enable those third parties to deliver content or advertise the products and services of TruShine Cleaning. We may share Personal Data with those service providers and partners, and they may have access to or process your Personal Data. For example, TruShine Cleaning may use thirdparty providers to assist us with delivering, marketing, and advertising our products and Services, processing payments you make to us, delivering customer service and support, and for e-commerce order fulfillment. In addition, with your knowledge and consent, our Services may gather and transfer information from other applications, functions, and tools within your mobile device.

2. With Social Networks.

Our Sites and apps will, in certain circumstances, provide you with social plug-ins from various social networks. If you choose to interact with a social network such as Facebook or Twitter (for example by registering an account), your activity on Sites or via our apps will also be made available to that social network.

3. For Joint Marketing.

From time to time, TruShine Cleaning might establish joint marketing relationships with other persons or entities whom we believe trustworthy and have privacy practices that are consistent with ours. In such cases and where permitted by applicable law we might exchange, share and/or cross-reference information, including information about you that will enable such persons or entities to contact you regarding products and services that may be of interest to you. If you would like to opt out of our exchange of your information with other marketers, please let us know by writing to our Support Team.

4. In Discussion Forums.

Content you post through the Services such as reviews, commentary on discussion boards or blogs, and certain social networking preferences (e.g. pages you "Like" or "Recommend") may be accessible by other users and companies and may appear on other websites or web searches, and therefore this information could be read, collected, and used by others. TruShine Cleaning cannot ensure the privacy of any Personal Data included in such user generated content. Please note that TruShine Cleaning does not necessarily verify, endorse, or agree with any content posted in discussion forums. 5. In Business Transfers (country specific disclosures may apply).

In the event that TruShine Cleaning sells certain of its assets or goes through a structural change, such as a merger, acquisition by another company, bankruptcy, insolvency, or dissolution, to the extent permitted by applicable law Personal Data may be transferred to a third party as part of such event and thereby become subject to the privacy practices of that third party, which may materially different than those of TruShine Cleaning.

6. With Your Consent.

TruShine Cleaning will share your Personal Data with other third parties (different from those described in this section) in certain limited circumstances. In these instances, we will, to the extent required by applicable law, obtain your consent to share your Personal Data in this way.

7. For Legal Compliance and Special Circumstances.

We may be required, subject to applicable law, to disclose your Personal Data if: (i) it is reasonably necessary to comply with legal process (such as a court order, subpoena, search warrant, etc.) or other legal requirements of any governmental authority, (ii) such a disclosure would potentially mitigate our liability in an actual or potential lawsuit, (iii) it is necessary to protect our legal rights or property (such as enforcing or applying applicable terms and conditions and other agreements, including the Services' terms of service), or (iv) it is necessary to protect the legal rights or property or physical security of others, or for the prevention or detection of crime and such disclosure is lawful.

IV. Data Security

TruShine Cleaning takes precautions to secure your personal information and protect it from loss, theft, unauthorized access, destruction, use, modification and disclosure. Such measures include technological, physical, and organizational safeguards that are appropriate given the sensitivity of the personal information, including maintaining controlled access to electronic and paper documents and files, and using appropriate technology safeguards such as passwords firewalls and encryption as well as non-disclosure or confidentiality agreements as we deem appropriate to protect your data. However, please note that TruShine Cleaning's security measures may change or be unavailable from time to time and no data transmission over the Internet or any wireless network is 100% secure.

V. Data Retention

TruShine Cleaning will retain Personal Data for so long as it continues to be useful in connection with providing or improving TruShine Cleaning's Services and product offerings and this Policy, except if required otherwise by applicable law. We may further retain and use data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

VI. Cookies and Other Data Collection Tools

TruShine Cleaning and its partners use various technologies to collect information when you use our Services, including sending cookies to your device and using web beacons. By using the Services you consent to the use of such technologies, including cookies and pixel tags, to collect information about you. These technologies help us personalize your use of our Sites and mobile applications, customize the Services, and mitigate risks and the potential for fraud. These technologies are also used by TruShine Cleaning and its advertising partners to deliver ads to you based on your interests and online activities.

1. How We Use Cookies.

When you access or use the Services, our web server may send a cookie to your device. "Cookies" are small data files placed on a device's hard drive or memory when you interact with a website or view a message. Among other things, cookies support the integrity of our registration process, retain your preferences and account settings, and help evaluate and compile aggregated statistics about user activity. We may use cookies to:

• Remember that you have visited us or used the Services before and personalize our content for you and remember your preferences (for example, your choice of language or region).

• Ensure we have enough capacity to accommodate all of our users and that users are finding what they are looking for easily and do not encounter technical errors.

• Collect anonymous statistical information about how you use the Services (including the length of your web or application session) and the location from which you access the Services, so that we can improve the Services and learn which elements and functions of the Services are most popular with our users

• Helps us and our ad partners to deliver ads or messages that are relevant to you and your interests. We may also share this information with third parties for this purpose. For example, these cookies allow us to identify and send you messages about items you have left in your cart and make other purchasing recommendations.

2. We Use Third-Party Cookies.

We may allow third parties to collect information via the Services through cookies, third party plug-ins and widgets. Third party cookies enable third party features or functionality to be provided on or through the Sites (e.g., we may use Google Analytics and Google Adwords to collect and process certain analytics data).

3. How We Use Web Beacons.

Some of our websites and Services may contain electronic images called "web beacons". Web beacons are objects embedded in a web page or email which are used to check if a user has accessed content. In addition to allowing us to count how many persons read our messages, web beacons allow us to develop statistical information about the activities and features that most interest our users in order to provide more personalized content.

4. Do Not Track Browser Signals.

Do Not Track ("DNT") is an optional browser setting that allows you to express your preferences regarding tracking across websites. Unless required by applicable law our Sites are not generally configured to respond to DNT signals. We and third parties operating on the services may continue to collect information in the manner described in this Privacy Policy from web browsers that have enabled DNT signals or similar mechanisms.

VII. How To Manage Your Privacy Settings

We provide you several ways to manage your privacy settings:

1. Update your Account Information If your Account Information changes, you may update or delete and deactivate certain aspects of your Account Information by signing into and managing your TruShine Cleaning account or, if your account does not so permit, by contacting us at support@trushinecleaning.com. In addition, depending on the nature of your account, your account management page may allow you to control certain aspects of how other information you submit to the Services is used or shared. 2. Set your preferences to opt-out of communications. There are several ways for you to control how TruShine Cleaning communicates with you:

o Email and Mobile Messages: You have the ability to unsubscribe to promotional emails or text messages received from us by following the instructions in those emails or text messages. If you use more than one Service, then opting out of the emails relating to that Service will not necessarily stop you receiving emails from other Services.

o Push Notifications: To the extent applicable you can manage the type of push notifications you receive from TruShine Cleaning (if any) by modifying the settings of your TruShine Cleaning applications and websites. You may set your mobile device to not allow push notifications from us.

o Postal Mail: You may stop receiving marketing materials sent by postal mail from us by writing to our Support Team or following the opt-out instructions that may be included within those communications.

3. Manage your Location.

Most mobile devices give users the ability to control whether location signals are enabled. Disabling location signals will not allow us to collect your Location Data (by virtue of the location of your mobile device) and may impact the operation of a Service. If you have questions about how to set the location preferences for your device, you can contact your mobile service carrier or your device manufacturer. If you unsubscribe to email marketing messages it may take up to 10 business days before you stop receiving emails and we may still send you non-promotional communications, such as digital receipts (if applicable) and communications about your account. Requests to stop or update postal mail marketing communications may take up 6-8 weeks to process.

VIII. Children

The Services are intended for general audiences and is not directed to persons less than 13 years of age and we do not knowingly collect Personal Data from those persons. If you become aware that personal information about your child has been provided to TruShine Cleaning without your consent, please contact us. If we become aware that a child under 13 has provided us with Personal Data, we will take steps to delete the information, except where we are required by applicable law to keep it.

IX. Third Parties We Do Not Own or Control

This Privacy Policy does not apply to the practices of companies that we do not own or control or to people that we do not employ or manage. For example, if you choose to pay through a third-party mechanism offered on our website, the information you choose to share with that third-party will be treated in accordance with that third-party's privacy policy. This Policy does not apply to, and we are not responsible for, for the content of such third-party features or the privacy practices, including third-party cookies, web beacons, or other tracking technologies, of such third parties. We encourage you to read the privacy policies of each and every device, website, and service that you use.

X. How to Contact Us

TruShine Cleaning welcomes questions and comments about this Privacy Policy. You can contact us by emailing us at support@trushinecleaning.com or calling us at 703-594-9997.

XI. Amendments

We may change this Policy from time to time. The most current version of this Policy will be effective at the time it is posted. By continuing to access or use the Services after those changes become effective, you agree to be bound by the revised Policy. If you have a registered account, we may notify you of any changes to our Privacy Policy via email and/or we may ask you to affirmatively acknowledge and consent to the changes the next time you use our Services.