



## Privacy Policy

**Effective Date: 10-16-2019**

This Privacy Policy covers Baby Brilliance, LLC ("Baby Brilliance," "We," "us," "our") policies on the collection, use, and disclosure of personally identifiable and other Persona Data (as defined by California Consumer Privacy Act of 2018, Civil Code sections 1798.100 et seq ("CCPA")) (collectively referred to as "Personal Data") when visitors and Consumers (as defined by the CCPA) (collectively "Users") access [www.babybrilliance.net](http://www.babybrilliance.net) ("Site") and/or the Baby Brilliance mobile applications (collectively the "Platform") and the software and services made available through the Platform (collectively the "Services").

By checking the "**I consent to the Privacy Policy**" box and subject to your opt-in/opt-out preferences, you consent to the collection, use and disclosure practices identified in this Privacy Policy.

### 1. **What Information Is Collected by Baby Brilliance And How Is It Used?**

**Categories of Personal Information. Email address, name, phone number and cookies are collected for the following purposes:**

- **Account Creation Information:** When logging in to a client portal, Users must provide their email address. The collection of this information is necessary to fulfill our contractual obligations and to provide the Services to you. Your email may also be utilized to (i) provide information regarding our Services; and/or (ii) to communicate material changes to our Terms of Service and Privacy Policy.
- **Newsletters and Information Requests:** Users may optionally provide their name, phone and email address when a User initiates a contact request through the Platform. Users may also optionally subscribe to our newsletters and may unsubscribe at any time through the opt-out link contained within those communications.
- **Site Use:** Baby Brilliance utilizes cookie technology to gather information on Internet use in order to serve its Users more effectively. As described in Section 2, Baby Brilliance also utilizes third party analytics services which may also use tracking cookies to provide information about the use of our Platform. **Users can set your browser to remove or reject cookies and/or**

**accept or refuse cookies on the cookie consent banner on the site itself; however, some Platform features or Services may not work properly without cookies.**

## **2. Is Information Collected By Or Disclosed To Third Parties?**

**BABY BRILLIANCE DOES NOT SELL, RENT, OR LEASE PERSONAL DATA TO ANY THIRD PARTIES. HOWEVER, PERSONAL DATA IS SHARED WITH THIRD PARTIES FOR PURPOSES OF PROVIDING SITE SERVICES AS FOLLOWS:**

**Web Hosting Services:** The Site and Personal Data collected is stored on cloud servers maintained by WPEngine. For more information on its privacy policy, please see the [WPEngine Privacy Policy](#).

**Customer Services Support:** Baby Brilliance utilizes Drift Chat to communicate with you on the Site to respond to service related questions. Please see [Drift's Privacy Policy](#)

**Anonymous Data - Analytics:** Baby Brilliance utilizes Google Analytics, a web analytics tool which collects information anonymously. It provides a report to Baby Brilliance with website trends without identifying individual visitors. For more information on its privacy policy, please see: [Privacy Policy](#). However, if you do not want your Personal Data to be used by Google Analytics, you may opt-out by installing [Google Analytics Opt-out Browser Add-on](#).

**Third Party Advertising/Re-Targeting Services:** When accessing the Platform, third party advertising services may place a cookie on your browser, which may be used to target relevant advertisements to you when you visit third party websites. Users may opt-out from receiving targeted advertisements by visiting the (1) [Network Advertising Consumer Opt-Out](#) page, (2) [Digital Advertising Alliance Opt-Out](#) page, and/or (3) the opt-out provisions pertaining to the applicable advertising services/retargeting provider.

**Social Plug-Ins:** Users may follow Baby Brilliance and/or share information on [Facebook](#), [Twitter](#), [Pinterest](#), [Instagram](#), and [LinkedIn](#). Users should click on the hyperlinks for each site to review the applicable privacy policies for more detail about information collected by these sites.

**Client Engagement.** Contracts for services initiated through the Platform are processed by a third party business management software, Dubsado. Payments for all services are also processed through Dubsado. Baby Brilliance does not itself store debit or credit card information on its servers. Information is collected and processed pursuant to the [Dubsado Terms of Service](#) and [Privacy Policy](#).

**Third Party Links.** To enable Users to access relevant information from a wide variety of sources or to enable Users to purchase certain products, Baby Brilliance may place third party links to enable Users to access information and products directly from such third parties. Baby Brilliance is not responsible for the data collection and privacy policies of the entities supporting the third party links, and Users should review the applicable privacy policies for more detail about information collected from these sites.

**Other Potential Third Party Disclosures:** Personal Data may also be disclosed to third parties to serve our legitimate business interests as follows: (1) as required by law, such as to comply with a subpoena, or similar legal process, (2) if Baby Brilliance is involved in a merger, acquisition, or sale of all or a

portion of its assets, (3) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (4) enforce our agreements with you, and/or (5) investigate and defend ourselves against any third-party claims or allegations. We will use commercially reasonable efforts to notify users about law enforcement or court ordered requests for data unless otherwise prohibited by law.

### **3. How Does Baby Brilliance Comply With The Children’s Online Privacy Protection Act and GDPR Regulations Relating to Children?**

Only persons age 18 or older are authorized to make purchases from Baby Brilliance. We do not knowingly collect Personal Data from anyone under the age of 18. If a parent or guardian becomes aware that his or her child under the age of 16 has provided with Personal Data without their consent, he or she should contact Baby Brilliance at [privacy@babybrilliance.net](mailto:privacy@babybrilliance.net). We will delete such Personal Data from our files within a commercially reasonable time, but no later than required under the applicable law relating the child’s country of residence.

### **4. How Long Does Baby Brilliance Retain Personal Data Collected?**

We will retain account and purchase data as long as it is necessary to provide our Services to Users. Personal Data obtained from Site visitors will be maintained as long as it is necessary to provide requested communications and information-based services or until a Visitor exercises its right to opt-out of requested communications or information-based services. Anonymized, de-identified and Pseudo-anonymized data will be retained as long as Baby Brilliance determines such data is commercially necessary for its legitimate business interests.

## **5. CALIFORNIA PRIVACY RIGHTS**

### **CCPA Request Effective January 1, 2020: California Consumer’s Request to Know, Right to Delete, Right to Opt-Out of Sale Notices**

California Consumers may email Baby Brilliance at [privacy@babybrilliance.net](mailto:privacy@babybrilliance.net) or access the [CCPA Request](#) link at any time in order to exercise their CCPA right to:

- Request disclosure of specific pieces of Personal Data collected, Categories of Personal Data collected, Sources of Personal Data collected; Categories of Personal Data sold or disclosed and categories of third parties to whom Personal Data sold or disclosed, and the business purposes for collecting or selling such Personal Data.
- Restrict deletion of your Personal Data (except as otherwise exempt under applicable law);
- Opt-Out of the sale of your Personal Data;

For all CCPA based requests made pursuant to this section, Baby Brilliance will (a) verify a consumer request and respond as required under applicable law, (b) provide a copy of any requested Personal Data in a structured, commonly used and machine-readable format, and (c) transmit such Personal Data to another service provider without restriction in accordance with applicable law.

A Verifiable Consumer Request under this Section may be submitted to Baby Brilliance effective January 1, 2020 either by emailing Baby Brilliance at [privacy@babybrilliance.net](mailto:privacy@babybrilliance.net) or through the “[CCPA Request](#)”

link. Baby Brilliance will verify all requests with the Consumer email address on file with the email address submitted in the applicable request form. Consumers may designate an authorized agent to make a request on the consumer's behalf utilizing the "[CCPA Request](#)" link

**UNDER THE CCPA, CONSUMERS MAY ONLY MAKE A PERSONAL INFORMATION REQUEST **TWICE** IN A 12-MONTH PERIOD.**

Additionally, California law permits Users to request and obtain from once a year, free of charge, certain information about their Personally Identifiable Information ("PII") (as defined by California law) disclosed to third parties for direct marketing purposes in the preceding calendar year (if any). If applicable, this information would include a list of the categories of PII that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year.

**6. What Is the Baby Brilliance Security Policy?**

We have implemented reasonable administrative, technical and physical security measures in accordance with the Baby Brilliance's Enterprise Security Policy to protect Personal Data against unauthorized access, destruction or alteration. However, although we endeavor to provide reasonable security for information we process and maintain, no security system can ever be 100% secure.

**7. How Does The Platform Respond To "Do Not Track" Signals?**

"Do Not Track" is a feature enabled on some browsers that sends a signal to request that a website disable its tracking or cross-Platform user tracking. At present, the Platform does not respond to or alter its practices when a Do Not Track signal is received.

**8. How Will I Be Notified Of Changes To Your Privacy Policy?**

If we make material changes to our Privacy Policy, we will notify you by (1) changing the Effective Date at the top of the Privacy Policy, (ii) sending an email to all active account holders, *and* (iii) add a banner/ notification to the Platform itself. Express consent will be obtained when required for any material changes in Baby Brilliance's collection and use practices.

**9. Contact Us**

If you have any questions regarding your Personal Data or about our privacy practices, please contact us at: Baby Brilliance, Attention: Privacy Department, [9393 N 90th St., Ste. 102 #118, Scottsdale, AZ 85258] and [privacy@babybrilliance.net](mailto:privacy@babybrilliance.net).

***This Privacy Policy was last updated on October 18, 2019***