

Privacy Policy

Last updated and effective date: Aug 2, 2024

This Privacy Policy describes how Safety Labs Holding Company dba SC Labs (collectively, “SC Labs,” “we,” “us,” or “our”) collect, use, disclose, and protect our customers’ personal information. It also tells you about the rights and choices you have with respect to your personal information, and how you can reach us to get answers to your questions. Please note, our privacy practices are subject to the applicable laws of the places in which we operate. You will see additional region-specific terms that only apply to customers located in those geographic regions, or as required by applicable laws.

1. What Our Privacy Policy Covers

This Privacy Policy covers SC Labs’ operations in the United States, and applies to the personal information SC Labs obtains in various contexts, both online and offline, including when you access or use our websites or any other applications or services that link to this Privacy Policy, communicate with us, or engage with us on social media.

We may provide different or additional privacy notices in connection with certain offerings. We may also provide additional “just-in-time” notices that may supplement or clarify our privacy practices or provide you with additional choices regarding your personal information.

Our websites may include links to websites and/or applications operated and maintained by third parties. Please note that we have no control over the privacy practices of websites or applications that we do not own. We encourage you to review the privacy practices of those third parties.

2. What Personal Information We Collect

The types of personal information we obtain about you depends on how you interact with us and our services. When we use the term “personal information,” we are referring to information that identifies, relates to, describes, or can be associated with you. The following are the categories and specific types of personal information that we may collect:

Basic Identifying Information

Including your full name, alias, postal address, email address, phone number, date of birth, account name, signature, username, social media handle, or other similar identifiers.

Government-Issued Identifiers

Including your driver’s license number or other similar government identifier.

Device Information and Other Unique Identifiers

Including device identifier, internet protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifier, or similar unique identifiers.

Internet or Other Network Activity

Including browsing or search history and information regarding your interactions with our websites, mobile applications, emails, or advertisements.

Geolocation Data

Including information that permits us to determine your location, such as if you manually provide location information or enable your mobile device to send us precise location information.

Payment Information

Including credit or debit card numbers.

Commercial Information

Including services you have purchased and your preferences.

Demographic Data

Including age, gender, race, ethnicity, estimated income, and household information, some of which may include characteristics of protected classifications under U.S. state or federal law.

User Content

Including your communications with us and any other content you provide (such as photographs, images, videos, survey responses, comments, and other content).

Audio and Visual Information

Including photographs, images, videos, and recordings of your voice (such as when we record customer service calls for quality assurance).

Sensitive Personal Information

SC Labs only collects sensitive personal information, as defined by applicable privacy laws, for the purposes allowed by law or with your consent. SC Labs does not collect or process sensitive personal information for the purpose of inferring characteristics about you.

3. How We Collect Your Personal Information

We collect personal information about you from various sources. For example, we collect and obtain information:

Directly from You

We collect personal information you provide, such as when you engage our services, register for an account or create a profile, contact us, respond to a survey, apply for a job, or sign up to receive emails, text messages, and/or postal mailings.

Using Online Tracking Technologies and Other Automatic Data Collection Technologies

When you visit our websites, open or click on emails we send you, or interact with our advertisements, we or third parties we work with automatically collect certain information using online tracking technologies such as pixels, web beacons, software developer kits, third-party libraries, and cookies. For more information, please see “Cookies and Similar Online Tracking Technologies” section below.

Through Offline Technologies

We may record customer service calls and/or maintain a transcript of chats for quality assurance.

From Our Business Partners

We may obtain information from businesses that we have partnered with.

From Social Media Platforms and Networks

If you interact with us on social media or use features such as plugins, widgets, or other tools made available by social media platforms or networks (including Instagram, Facebook, Twitter/X, Google, YouTube, and Pinterest) in connection with our websites, we may collect information that you disclose to us, or that the social media platforms disclose to us. For more information about the privacy practices of those social media platforms, please review the privacy policies and settings of the social media platforms and networks that you use.

From Other Sources

We may obtain information about you from other sources, such as data analytics providers, marketing or advertising service providers, fraud prevention service providers, vendors that provide services on our behalf, or publicly available sources. We also create information based on our analysis of the information we have collected from you.

4. Cookies and Similar Online Tracking Technologies

We and our third-party partners and service providers (such as advertising networks, analytics providers, and social media platforms and networks) use pixels, web beacons, software developer kits, third-party libraries, cookies, and other similar online tracking technologies (collectively, “online tracking technologies”) to gather information when you interact with our websites and email communications. Some online tracking

technologies help us maintain the security of our websites and your account, prevent crashes, fix bugs, save your preferences, and assist with basic site functions.

We may also permit third parties and service providers to use online tracking technologies on our websites for analytics and advertising, including to help manage and display advertisements, to tailor advertisements to your interests, or to send abandoned shopping cart reminders (depending on your communication preferences). The third parties and service providers use their technology to provide advertising about products and services tailored to your interests which may appear either on our websites or on other websites.

To the extent these online tracking technologies are deemed to be a “sale” / “sharing” (which includes targeted advertising, as defined under the applicable laws) under applicable U.S. state laws, you can opt-out of these online tracking technologies by contacting us as listed at the bottom of this page. Please note, some features of our websites may not be available to you as a result. For Google Analytics, at your end, you may exercise an opt out going to tools.google.com/dlpage/gaoptout or downloading the Google Analytics Opt-out Browser Add-on. You may adjust your Google advertising settings by visiting adssettings.google.com.

5. How We Use Your Personal Information

We collect and use personal information for various purposes, including:

Providing Products and Services

We use your personal information to provide services, such as to fulfill your orders and/or complete the transactions you request, to process your payments, to provide you invoices, and to provide test results.

Depending on the services you request, the categories of information used for these purposes may include Basic Identifying Information, Payment Information, and Commercial Information.

Communicating With You

We use your personal information to communicate with you, such as to respond to and/or follow-up on your requests, inquiries, issues, or feedback, and to provide customer service.

Analytics

We may use personal information to conduct research and analytics, including to improve our services and product offerings; to understand how you interact with our websites, advertisements, and communications with you; to improve our websites; to personalize your experience; to save you time when you visit our websites; to customize the marketing and advertising that we show you; to provide services; and to better understand our customers' needs.

Security and Fraud Prevention

We may use personal information to detect, investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions; attempts to manipulate or violate our policies, procedures, and terms and conditions; security incidents; and harm to the rights, property, or safety of SC Labs and our users, customers, employees, or others.

Legal Obligations

We use personal information to comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.

Core Business Functions

We use personal information to support core business functions, including to maintain records related to business process management, loss and fraud prevention; to collect amounts owing to us; and to provide and maintain the functionality of our website and SC Labs Mobile Apps, including identifying and repairing errors or problems.

Applicant

To review the Applicant Privacy Policy, please visit: <https://www.SCLabs.com/beauty/applicant-privacy-policy>

6. How We Disclose Your Personal Information

In addition to the specific situations discussed elsewhere in this Privacy Policy, such as the “Cookies and Similar Online Tracking Technologies” section above, we disclose personal information in the following circumstances:

Corporate Affiliates

We may disclose personal information with our corporate affiliates, including our parent company, sister companies, and subsidiaries. Such corporate affiliates process personal information on our behalf as our service providers, where necessary to provide a service that you have requested or in other circumstances with your consent as permitted or required by law.

Service Providers

We may disclose certain personal information to service providers that perform services to support our core business functions and internal operations; sending postal mail, emails, and text messages; analyzing customer data; providing marketing assistance; supporting beacons; processing credit card and debit card payments; investigating fraudulent activity; conducting customer surveys; and providing customer service.

Business Partners

We may disclose your personal information with businesses that we have partnered with to jointly create and offer a service or joint promotion. If you decide to obtain a product or service that is offered by these partners, the information you provide will be disclosed to us and them. Their use of your information is not governed by this Privacy Policy but by their own respective privacy policies.

Social Media Platforms and Networks

Some of our websites have features such as, plugins, widgets, and/or other tools made available by social media platforms and networks that may result in information being collected or disclosed between us and such parties. Their use of your information is not governed by this Privacy Policy.

Legal Process

We may disclose personal information to comply with relevant laws and regulations or in response to subpoenas, warrants, court orders, government inquiries, or investigations. We may also disclose information to establish, exercise, or protect the rights of our company, employees, agents, and affiliates; to defend against a legal claim; to protect the safety and security of our visitors; to detect and protect against fraud; and to take action regarding possible illegal activities or violations of our policies.

Transfer of Control

We may disclose personal information with another company that buys some, or all, of the assets or stock of SC Labs, and that company may use and disclose personal information for purposes similar to what is described in this policy. SC Labs may also disclose personal information with prospective purchasers to evaluate the proposed transaction.

Other Instances

We may ask if you would like us to disclose your information with other third parties who are not described elsewhere in this Privacy Policy.

7. How We Protect Your Personal Information

Personal information is maintained on our servers or those of our service providers, and is accessible by authorized employees, representatives, and agents as necessary for the purposes described in this Privacy Policy.

We realize that individuals trust us to protect their personal information. We maintain reasonable and appropriate physical, electronic, and procedural safeguards designed to help protect your personal information. While we attempt to protect your personal information in our possession, no method of transmission over the internet or security

system is perfect, and we cannot promise that information about you will remain secure in all circumstances.

For your convenience, our websites may include functionality that allows you to remain logged in so that you do not have to re-enter your password each time you want to access your account. If you choose to remain logged in, you should be aware that anyone with access to your device will be able to access and make changes to your account and may be able to make purchases through your account. For that reason, if you choose to remain logged in, we strongly recommend that you take appropriate steps to protect against unauthorized access to, and use, of your account. Please also notify us as soon as possible if you suspect any unauthorized use of your account or password.

8. Your Rights

Consistent with applicable law, you may exercise the rights described in this section. Please note that some of the rights may vary depending on your country, province, or state of residence.

The Right to Opt Out of Cookies and Sale/Sharing Using Online Tracking Technologies

Our use of online tracking technologies may be considered a “sale” / “sharing” under applicable law. Visitors to our website can opt out of being tracked by these third parties by clicking the “Your Privacy Choices” link at the bottom of our website and selecting their preferences.

If you do not have a SC Labs account or if you are not logged into your SC Labs account, your request to opt out of “sale” / “sharing” will be linked to your browser identifier only and not linked to any account information because the connection between your browser and the account is not known to us.

You may opt out by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC) (on the browsers and/or browser extensions that support such a signal). To download and use a browser supporting the GPC browser signal, click here: <https://globalprivacycontrol.org/orgs>. If you choose to use the GPC signal, you will need to turn it on for each supported browser or browser extension you use.

If you would like us to make the connection between your browser and your account when you send the opt-out of “sale” / “sharing” of your personal information request or GPC signal, and you have not yet opted out of “sale” / “sharing” your personal information, we recommend you submit the Do Not Sell or Share Personal Information form that is in Your Privacy Choices. As stated above, the Your Privacy Choices link is available at the bottom of the SC Labs website.

You can opt out of targeted advertising by clicking the “Your Privacy Choices” link at the bottom of our website and selecting the appropriate preferences.

Categories of personal information disclosed that may be considered “sale” / “sharing”: Basic Identifying Information, Device Information and Other Unique Identifiers, Internet or Other Network Activity, Geolocation Data, and Commercial Data.

Categories of third parties to whom personal information was disclosed that may be considered “sale”/ “sharing” include advertisers and marketing partners, data analytics providers, and social media networks.

The Right to Limit the Use of Sensitive Personal Information

As mentioned above, SC Labs only collects sensitive personal information, as defined by applicable privacy laws, for the purposes allowed by law or with your consent. SC Labs does not collect or process sensitive personal information for the purpose of inferring characteristics about you.

Some of the purposes for the collection and processing of sensitive personal information allowed by law include: to perform the services reasonably expected; to prevent, detect, and investigate security incidents; to resist malicious, deceptive fraudulent, or illegal actions directed at SC Labs and to prosecute those responsible for those actions; to ensure the physical safety of natural persons; for short-term, transient use; to perform services on behalf of SC Labs; and to verify or maintain the quality or safety of a product or service provided by SC Labs.

Therefore, SC Labs does not offer the right to limit the use of sensitive personal information.

The Right to Access, Correct, and Delete Personal Information

Depending on your state of residence in the U.S., you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law.

Access and Deletion

You can submit a request to access or delete your personal information, or withdraw consent, by:

Emailing us at hello@buildmysop.com; or

Calling us at 505-252-2970

Typically, we retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. Please note that in many situations we must retain all, or a portion, of your personal information to comply with our legal obligations; resolve disputes; enforce our agreements; protect against fraudulent, deceptive, or illegal activity; or for another one of our business purposes.

Corrections

You can correct information related to your account by:

Logging into your account on SC Labs.com; or

Calling 505-252-2970

You may submit a request for a copy of the information collected about you by following the steps outlined in the "Your Rights" section above. Depending on your state of residence, you may request for a copy of the information up to twice per year per customer.

Responding to Requests

Once you have submitted your request, we will respond within the time frame permitted by the applicable law. Please note that we may charge a reasonable fee for multiple requests in the same 12-month period, as permitted by law.

Appealing Requests

Depending on your state of residence in the U.S., you may be able to appeal our decision to your request regarding your personal information. To do so, please contact us in any of the ways listed in the "Communicating With Us" section. We respond to all appeal requests as soon as we reasonably can, and no later than legally required.

Identity Verification

For us to process some requests, we will need to verify your identity to confirm that the request came from you. We may contact you by phone or email to verify your request. Depending on your request, we will ask for information such as your name, an email address that you have used with SC Labs, or a phone number you have used with SC Labs. For certain requests, we may also ask you to provide additional details.

Authorized Agent

Depending on your state of residence in the U.S., you may designate an authorized agent to submit a request on your behalf to access or delete your personal information. To do so, you must: (1) provide that authorized agent written and signed permission to submit such request; and (2) verify your own

identity directly with us. Please note, we may deny a request from an authorized agent that does not submit proof that they have been authorized by you to act on your behalf.

If you have been designated as an authorized agent to submit a request on behalf of another customer, you must make the appropriate selection when you submit a Request Form.

Managing Communication Preferences

Email

You can stop receiving promotional emails at any time by:

Clicking on the “unsubscribe” link at the bottom of any promotional email that you receive from us; or

Logging into your account, clicking on the “My Account” page, and managing your email preferences.

Text Messages

You can opt-out of receiving text messages from us by replying “STOP” to the text message you receive from us. Please note that this will only opt you out of the specific text messaging program associated with that number. For more information, please refer to the SC Labs Text Messaging Terms & Conditions.

Right to Non-Discrimination

We do not discriminate against customers who exercise any of their rights described in our Privacy Policy.

9. Transmission of Information to Other Countries

SC Labs is located in the United States.

If you submit personal information to SC Labs, your personal information may be processed in a foreign country, where privacy laws may be less stringent than the laws in your country. By submitting your personal information to us you agree to the transfer, storage, and processing of your personal information in a country other than your country of residence including, but not necessarily limited to, the United States.

10. Children's Privacy

Our website is not intended for or directed to children under the age of 14. We do not knowingly collect personal information directly from children under the age of 14 without parental consent. If we become aware that a child under the age of 14 has provided us with personal information, we will delete the information from our records.

11. Communicating With Us

If you have any questions about our privacy or security practices, you can contact SC Labs by mail, telephone, or email:

Safety Labs Holding Company dba SC Labs
Legal Department, Privacy
100 Pioneer Street, Suite E
Santa Cruz, CA 95060
(866) 435-0709
info@sclabs.com

If we need, or are required, to contact you concerning any event that involves your personal information we may do so by email, telephone, or mail.

12. Changes To This Policy

We may revise this Privacy Policy from time to time and will post the date it was last updated at the top of this Privacy Policy. We will provide additional notice to you if we make any changes that materially affect your privacy rights.

13. Additional Information for California Residents

California law requires us to disclose the following additional information with respect to our privacy practices. If you are a California resident, this section applies to you in addition to the rest of the Privacy Policy.

California Shine the Light

Customers who are residents of California may request information concerning the categories of personal information (if any) we disclose to third parties or affiliates for their direct marketing purposes. If you would like more information, please submit a written request to us at this address:

Safety Labs Holding Company dba SC Labs
Legal Department, Privacy
100 Pioneer Street, Suite E
Santa Cruz, CA 95060

Categories of Personal Information We Collect and Our Purposes for Collection and Use

You can find a list of the categories of personal information that we collect in the “What Personal Information We Collect” section above. For details regarding the sources from which we obtain personal information, please see the “How We Collect Your Personal Information” section above. We collect and use personal information for the business or commercial purposes described in the “How We Use Your Personal Information” section above.

Categories of Personal Information Disclosed and Categories of Recipients

We disclose the following categories of personal information for business or commercial purposes to the categories of recipients listed below:

We disclose Basic Identifying Information with businesses, service providers, and third parties, such as advertising networks, analytics and social media networks.

We disclose Device Information and Other Unique Identifiers with businesses, service providers, and third parties, such as advertising networks, analytics, and social media networks.

We disclose Internet or Other Network Activity with businesses, service providers, and third parties, such as advertising networks, analytics, and social media networks.

We disclose Geolocation Data with businesses, service providers, and third parties such as advertising networks, analytics, and social media.

We disclose Payment Information with businesses and service providers who process payments.

We disclose Commercial Information with businesses, service providers, and third parties, such as advertising networks, analytics, and social media networks.

We disclose User Content with businesses and service providers who help administer our programs.

We disclose Audio and Visual Information with businesses and service providers who help administer customer service and fraud or loss prevention services.

We disclose Inferences with businesses and service providers who help administer marketing and personalization.

For more information on how your information is disclosed, please see the "How We Share Your Personal Information" section, which provides more detail on our business partners, service providers and third parties. We may also need to disclose any of the above categories of information pursuant to Legal Process or as a result of a "Transfer of Control" as described in the "How We Share Your Personal Information" section. As stated in the "Your Rights" section above, we typically retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.