Privacy Policy

This Privacy Statement explains our practices, including your choices, regarding the collection, use, and disclosure of certain information, including your personal information in connection with Return Done service

As a consumer, you are free to explore Return Done without providing any personal Information, as defined below, about yourself. However, this may limit your ability to receive certain information from Return Done and may limit your access to Return Done. To access certain features of Return Done, you must first complete member registration where we may ask for certain personal information, as defined below.

When signing up for a Return Done account you will be asked first to submit personal Information such as location, age, and gender. Return Done may also request, at your election, further information, including but without limitation, product photos, a profile picture, app usage reports, purchase history, and return history.

1. Contacting Us

a. If you have general questions about your account or how to contact customer service for assistance, please email us at support@returndone.com. For questions specifically about this Privacy Statement, or our use of your personal information, cookies, or similar technologies, please contact our Data Protection Officer/Privacy Office by email at support@returndone.com.

2. Collection of Information

- a. We receive and store information about you such as:
 - i. Information you provide to us: We collect information you provide to us which includes:
 - 1. your name, email address, payment method(s), telephone number, and other identifiers you might use. We collect this information in a

number of ways, including when you enter it while using our service, interact with our customer service, or participate in surveys or marketing promotions.

- ii. Information we collect automatically: We collect information about you and your use of our service, your interactions with us and our advertising, as well as information regarding your network, network devices, and your computer. This information includes:
 - 1. your activity on the Platform.
 - 2. your interactions with our emails and texts, and with our messages through push and online messaging channels;
 - details of your interactions with our customer service, such as the date, time, and reason for contacting us, transcripts of any chat conversations, and if you call us, your phone number and call recordings;
 - 4. device IDs or other unique identifiers, including for your network devices (such as your router);
 - 5. resettable device identifiers (also known as advertising identifiers), such as those on mobile devices, tablets, and streaming media devices that include such identifiers;
 - 6. device and software characteristics (such as type and configuration), connection information including type (Wi-Fi, cellular), statistics on page views, referring source (for example, referral URLs), IP address (which can be used to tell us your general location, such as your city, state/province, and postal code), browser and standard web server log information;
 - 7. information collected via the use of cookies, web beacons and other technologies, including ad information (such as information on the availability and delivery of ads, the site URL, as well as the date and time).

- iii. Information from partners: We collect information from other companies with whom you have a relationship ("Partners"). These Partners might include (depending on what services you use): your internet service provider, or other providers who make our service available on their device; mobile phone carriers or other companies who provide services to you and collect payment for the Return Done service for distribution to us or provide pre-paid promotions for the Return Done service; The information Partners provide us varies depending on the nature of the Partner services, and may include:
- iv. search queries and commands applicable to Return Done that you make through Partner devices;
- v. service activation information such as your email address or other contact information;
- vi. IP addresses, device IDs or other unique identifiers, as well as associated pre-paid promotion, billing, and user interface information, that support user authentication, the Return Done service registration experience, Partner payment processing.
- vii. Information from other sources: We also obtain information from other sources. We protect this information according to the practices described in this Privacy Policy, plus any additional restrictions imposed by the source of the information. These sources vary over time, but could include:
 - service providers that help us determine a location based on your IP address in order to customize our service and for other uses consistent with this Privacy Policy;
 - 2. security service providers that provide us with information to secure our systems, prevent fraud and help us protect the security of Return Done accounts;
 - 3. payment service providers that provide us with payment or balance information, or updates to that information, based on their relationship with you;

4. publicly-available sources such as publicly available posts on social media platforms and information available through public databases associating IP addresses with internet service providers (ISPs);

3. Use of Information

- a. We use information to provide, analyze, administer, enhance, and personalize our services and marketing efforts, to process your registration, your orders, and your payments, and to communicate with you on these and other topics. For example, we use such information to:
 - i. determine your general geographic location (such as your city, state/province, and postal code);
 - ii. provide localized content;
 - iii. determine your ISP to support network troubleshooting for you (we also use aggregated ISP information for operational and business purposes);
 - iv. help us quickly and efficiently respond to inquiries and requests;
 - v. coordinate with Partners on making the Return Done service available to members and providing information to non-members about the availability of the Return Done service, based on the specific relationship you have with the Partner;
 - vi. secure our systems, prevent fraud, and help us protect the security of Return Done accounts;
 - vii. prevent, detect, and investigate potentially prohibited or illegal activities, including fraud, and to enforce our terms (such as determining whether and for which Return Done signup offers you are eligible and determining whether a particular device is permitted to use the account consistent with our Terms of Use);

- viii. analyze and understand our audience, improve our service (including our user interface experiences and service performance) and optimize content selection, recommendation algorithms and delivery;
 - ix. communicate with you concerning our service so that we can send you news about Return Done, details about new features on Return Done, special offers, promotional announcements, consumer surveys, and to assist you with operational requests such as password reset requests. These communications may be by various methods, such as email, push notifications, text message, online messaging channels, and matched identifier communications.

4. Who does Return Done share information with

- a. Return Done may share your information, including Personal Information as follows:
 - i. Service Providers. At times, Return Done may disclose the information collected from you to a third party or other service provider. Return Done utilizes third parties and service providers to help achieve our purpose and render services offered. The third parties and service providers, in order to benefit Return Done, are allowed to access Personal Information stored with Return Done in order to perform their functions and for no other purpose.
 - ii. Commercial Partners and Third Parties. Return Done may, in connection with its services, disclose and sell your Personal Information you provide to us, such as demographic information, to commercial partners and third parties as well as other types of information collected. Return Done will ensure that all safety steps are taken to ensure that your information is protected and kept secure.
 - iii. Affiliates. Return Done may disclose the Personal Information to corporate affiliates or subsidiaries, their use, and disclosure of Personal Information is subject to this Privacy Policy.

- iv. Mergers. In the event of a merger with another company, or Return Done is acquired by another company, we may transfer the information we have collected to the other company.
- v. Protection. Return Done may disclose collected Personal Information where it is reasonably necessary to investigate, prevent or take action regarding illegal activities, including but not limited to, fraud, threats to the safety of a person, or violations of this Privacy Policy or our Terms of Service.

5. Where Information is Processed and Stored

- a. Your information may be stored and processed on our servers located in the United States. Data is processed at the operating locations of Return Done and any other places where the parties involved in the processing are located. Any of the corporate affiliates or third parties who receive or purchase your information may store your information on their servers in the United States or another country.
- b. Depending on your location, data transfers may involve transferring your personal information to places other than your own. To find out more about the place of processing and storing of such transferred personal information, you can check the section containing details about the processing of personal information.
- c. You are also entitled to learn about the legal basis of data transfers of personal information to a country outside the European Union or any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by Return Done to safeguard your personal information.
- d. If any such transfer takes place, you can find out more by checking the relevant sections of this document or inquire with Return Done using the information provided in the contact section.

- e. Personal information shall be processed and stored for as long as is required to achieve the purpose it has been collected for. Personal information collected for purposes related to the performance of a contract between Return Done and you shall be retained until such contract has been fully performed and, personal information collected for Return Done's legitimate interests shall be retained as long as needed to fulfill such purpose. You may find specific information regarding the legitimate interests pursued by Return Done within the sections of this Privacy Policy or by contacting Return Done.
- f. Return Done may be allowed to retain personal information for a longer period whenever you have given consent to such processing, as long as such consent is not withdrawn. Furthermore, Return Done may be obliged to retain personal information for a longer period whenever required to do so for the performance of a legal obligation or upon the order of a legal authority.
- g. Once the retention period expires, all personal information shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

6. Your Rights and Data Protection

- a. You may exercise certain rights regarding your personal information processed and retained by Return Done. In particular you have the right to:
 - i. Be informed. You have the right to know what rights and protections are offered to you as a consumer and/or user of Return Done.
 - ii. Withdraw your consent at any time. You have the right to withdraw consent where you have previously given your consent to the processing of your personal information.

- iii. Object to processing of your data. You have the right to object to the processing of your personal information if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- iv. Access your Data. You have the right to learn if your data is being processed by Return Done, obtain disclosure regarding certain aspects of the processing and obtain a copy of the data undergoing processing.
- v. Verify and Seek Rectification. You have the right to verify the accuracy of your personal information and ask for it to be updated or corrected.
- vi. Restrict the processing of your Data. You have the right, under certain circumstances, to restrict the processing of your data. In this case, Return Done will not process your data for any other purpose than storing it.
- vii. Have your personal information deleted or otherwise removed. You have the right, under certain circumstances, to obtain the erasure of your personal information from Return Done.
- viii. Receive your Data and have it transferred to another controller. You have the right to receive your data in a structured, commonly used, and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the data is processed by automated means and that the processing is based on your consent, on a contract which Return Done is part of or on pre-contractual obligations thereof.
- ix. Lodge a complaint. You have the right to bring a claim before their competent data protection authority.
- x. Not to be subject to automated decision-making including profiling.

- xi. Where personal data is processed for a public interest, in the exercise of an official authority vested in the Return Done or for the purposes of the legitimate interests pursued by Return Done, you may object to such processing by providing a ground related to their particular situation to justify the objection.
- b. You must know that, should your personal information be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn whether Return Done is processing personal information for direct marketing purposes, you may refer to the relevant sections of this document
- c. Any requests to exercise your rights can be directed to Return Done through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by Return Done as quickly as possible and always within one month. However, Return Done may refuse or charge for any request that is unfounded or excessive. Return Done will notify you of the refusal and the basis of that refusal and that you will have the right to complain to the supervisory authority and seek a judicial remedy within one month of the request.

7. Data Breaches and Data Security

a. Return Done takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of data. Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to Return Done, in some cases, data may be accessible to certain types of persons in charge involved with the operation of Return Done (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by Return Done. The updated list of these parties may be requested from Return Done at any time.

- b. Return Done safely secures personal information to prevent misuse, unauthorized access, disclosure, and loss by ensuring a level of security appropriate to the risk of information. Such levels of security include encrypting and pseudonymization of personal data wherever possible and considering all other technical and administrative procedures, generally accepted practices in the industry. Personal information is additionally stored on secured servers.
- c. However, despite Return Done's best efforts nothing can guarantee 100% security of your information. If you have any questions concerning the protection of your personal information, please contact Return Done.
- d. In the event of a data breach, Return Done will notify the corresponding supervising authority within seventy-two (72) hours of learning of the breach or after 72 hours with an explanation for the delay, to the supervising authority.

8. Your Information and Rights

- a. You can request access to your personal information, or correct or update out-of-date or inaccurate personal information we hold about you. You may also request that we delete personal information that we hold about you.
- b. When you visit the "Account" portion of our website, where you have the ability to access and update a broad range of information about your account, including your contact information, your Return Done payment information, and various related information about your account (such as the content you have viewed and rated). You must be signed in to access the "Account" section.
- c. For other requests, or if you have a question regarding our privacy practices, please contact our Data Protection Officer/Privacy Office at support@returndone.com. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.
- d. We may reject requests that are unreasonable or not required by law, including those that would be extremely impractical, could require disproportionate technical effort, or could expose us to operational risks such as enabling fraud.

e. Retention of information: We may retain information as required or permitted by applicable laws and regulations, including to honor your choices, for our billing or records purposes and to fulfill the purposes described in this Privacy Policy. Specifically, we retain information for our legitimate interests and essential business purposes, such as operating, maintaining and improving our services; complying with our legal obligations; and exercising our legal rights and remedies, including enforcing our terms of use. Our retention of information is based on many factors such as your relationship with Return Done; the nature of the information; compliance with our legal obligations; defending or resolving actual or anticipated legal claims. We take reasonable measures to destroy or de-identify personal information in a secure manner when it is no longer required.

9. Miscellaneous

- a. In addition to the information contained in this Privacy Policy, Return Done may provide you with additional and contextual information concerning particular services or the collection and processing of personal information upon request.
- b. California Civil Code Section § 1798.83 permits users of Return Done that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. You may make two requests per 12-month calendar year. To make such a request please see below Contact Information for Return Done. Please allow up to thirty (30) days for a response.
- c. Return Done complies with all applicable laws, codes and regulations related to the protection of children's privacy, including, but not limited to the Children's Online Privacy Protection Act of 1998 (COPPA). Return Done is not intended for children under sixteen (16) years of age. No one under such age may provide information to Return Done. We do not knowingly collect personal information from anyone under the age of 16. If you are under the age of 16, please do not provide any personal information to Return Done. If we learn that we have collected or received personal information from an individual under 16 without verification of parental consent, we will delete that information. Please feel free to contact us if you believe we may have any information from or about an individual under the age of 16.

d. Contact Information

 If you wish to contact Return Done with questions or comments about this Privacy Policy or privacy practices or, wish to exercise any of your rights detailed in the above Privacy Policy, please contact us at:

Return Done LLC

3320 S Indiana Ave, Apt 2

Chicago, IL, 60616 support@returndone.com (312) 934-5955

- e. Changes We will update this Privacy Statement from time to time in response to changing legal, regulatory, or operational requirements. We will provide notice of any such changes (including when they will take effect) in accordance with law. Your continued use of the Return Done service after any such updates take effect will constitute acknowledgement and (as applicable) acceptance of those changes. If you do not wish to acknowledge or accept any updates to this Privacy Statement, you may cancel your use of the Return Done service. To see when this Privacy Statement was last updated, please see the "Last Updated" section below.
- f. Security We use reasonable administrative, logical, physical, and managerial measures to safeguard your personal information against loss, theft, and unauthorized access, use and modification. These measures are designed to provide a level of security appropriate to the risks of processing your personal information.