

PRIVACY AND COOKIE POLICY

From Head to Toes
www.fromheadtotoes.nl

I. INTRODUCTION

From Head to Toes (“Company,” “we,” “our,” “us,” “website,” “site”) is committed to protecting the privacy of its users and (potential) customers (“you,” “your,” “visitors”, “customers”) as we take your privacy very seriously. This site collects some personal information from its users, and this Privacy Policy describes our policies regarding the collection, usage, and disclosure of that personal information. This Privacy Policy applies to From Head to Toes processing of personal data in the context of its establishments in the EEA, as well as From Head to Toes offering of goods and services, or monitoring the behavior, of individuals located in the EEA.

Under the European Union’s General Data Protection Regulation (GDPR), this website collects personal information as a Controller. We determine how personal information is collected, how long it is retained, and what it will be used for. We use third party service providers, who act as data processors, for tasks such as monitoring our website traffic, email marketing, advertising, and other limited tasks. We have confirmed to the best of our ability that these third party service providers are GDPR-compliant. Their use of your personal information is strictly limited to what is necessary to perform their tasks.

II. PERSONAL INFORMATION COLLECTION AND USE

Through your use of our website, we collect certain types of personal information: data you provide, and data that is automatically collected when you use our website. The personal information we collect may include, but is not limited to:

- First name and last name
- Email address
- Phone number (if you share it with us)
- Product interest (if you share it with us)
- Usage data
- Social media profile details you choose to make public.

We collect the personal data in the ways described below and may use your personal data in the following ways. In each case, we note the grounds that we rely on to use your personal data.

Personal User Information Voluntarily Provided

While using our website, you may voluntarily provide personal information to us by subscribing to our newsletter or email list, downloading our free content, commenting on our social media platforms, completing surveys, contacting us through our website or social media platforms, or through any other form of voluntary engagement with us and/or the website.

Your name, email address, phone number, company name and social media profile details will be used to communicate with you, provide customer support, respond to your request, to conduct our business and to send marketing and information about the services and activities of the Company (where you have chosen to receive these).

Our legal basis for processing your personal data is our legitimate interests (in order to undertake the above tasks) and your consent. We ask for your explicit consent if we need it for the processing of your personal data. If the use of your data is based on your explicit consent, you may at any time withdraw your consent for future processing for that purpose.

Usage Data

We collect usage data automatically when you visit our website. The usage data we collect may include your device's IP address, operating system, browser type and version, geographical location, which pages of our website you visit, how often, the date and time of your visit, and mobile information. If you access our website on a mobile device, we may collect unique mobile identifiers.

We collect this data through analytics tracking systems such as Google Analytics and Microsoft Clarity.

We use this data – depending on your cookie settings - to analyze and improve our website's performance, to facilitate the use of our website, to improve the content of our webpage and social media platforms, to provide relevant content and advertising to our users, and to improve our products and services.

Our legal basis for processing your personal data is our legitimate interests (in order to undertake the above tasks) and your consent.

Transaction Data

Transaction data is personal information we collect related to your purchase of our products and/or services. We use this information because it is necessary in order for us to provide our products and services to you. Through buying our products or services, you are entering a contract with us. We have a legal basis to process your transaction data in performance of that contract.

Preventing Fraud and Legal Compliance

We may also use your personal information to assist in detecting and preventing fraud and where necessary to comply with legal or law enforcement obligations.

III. COOKIES, PIXELS AND WEB BEACONS

Cookies are small text files that contain data and sometimes a unique identifier. Cookies are sent to your computer or device's browser and stored on your device's hard drive. We use cookies to collect information about your usage of our site, which may include your preferences, in order to personalize your experience on our website and advertisements, as well as to analyze and improve the use of our website. Our website uses session cookies and persistent cookies.

We may also send Facebook pixels and web beacons to your computer or device to identify your browser and improve the quality of our website and advertising.

Session Cookies

We use session cookies, which expire once you close your browser, to enable you to use all of the features of our website. These are **strictly necessary** cookies, which do not require your consent. Without these cookies, all of the services of our website will not be available for you to utilize.

Persistent Cookies

If the persistent cookies require permission, we request your consent on the website before placing them on your device. Persistent cookies stay on your computer or device until you delete them. Persistent cookies used by our website include:

1. **Personalization and Functionality Cookies:** We use cookies to remember choices you make when using our website.
2. **Analysis and Performance Cookies:** We use cookies to track traffic to our website. We use these cookies to monitor the performance of our website and services, as well as track how new features we employ perform.
3. **Targeting Cookies:** These cookies record visits to our website and track user browsing habits while on our website. We use this information to ensure the advertising displayed on our website is relevant to our users.
4. **Security Cookies:** We may use cookies to prevent fraud on our website and protect user accounts.

IV. OPTING OUT AND MANAGING COOKIES

Once you have given us your consent to the use of cookies, we store a cookie on your computer or device to remember this for next time. Your consent will expire periodically.

If you do not accept cookies on our website, your experience on our webpage may be impacted as all of our features and functionality may not be available to you. If you wish to withdraw your consent at any time, you will need to delete your cookies using your internet browser settings.

1. Disable the use of cookies in your computer or device's browser
2. Delete the cookies associated with this website that are saved in your browser.

Please visit the help pages of your web browser for more information on deleting cookies.

For Google Chrome:

<https://support.google.com/accounts/answer/32050?co=GENIE.Platform%3DDesktop&hl=en>

For Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

For Internet Explorer:

<https://support.microsoft.com/en-us/help/278835/how-to-delete-cookie-files-in-internet-explorer>

For Firefox: <https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox>

If you have any questions about this Cookies Policy, you can contact us at:

info@fromheadtotoes.nl

V. EMAIL MARKETING

If you download any of our free materials, purchase any of our services or products, subscribe to our newsletter, you will only be added to our email list when you affirmatively consent to be added. You have the option to unsubscribe at any time from the bottom of every email we send or by emailing us at **info@fromheadtotoes.nl**

If you are an existing customer of **From head to Toes** (for example we provided products and/or services to you), we may use the contact details you provided to send you marketing communications about similar **From head to Toes** products or services (unless you have opted-out). In other cases, we ask for your consent to send you marketing information.

VI. SHARING AND DISCLOSING YOUR PERSONAL INFORMATION

We may need to share your personal data with third parties to help us provide services and products to you and to run our Website. We protect your privacy and share your personal information for limited purposes in any or all of the following:

1. We may share your personal information with our **business partners**. Our business partners are required to abide by this same Privacy Policy.
2. Except as described in this Policy, we will not disclosure your personal data to third parties without your consent. We may share your personal data with third parties, such as cloud services, systems e.g. WIX, Google Analytics, Microsoft Clarity, Active Campaign Marketing Automation, CAS-CRM or similar systems, in order to store the personal data, analyze the performance of our website, maintain this website and administer our business.

These providers are obligated not to disclose your personal information and their use of said personal information is limited to what is necessary to perform their obligations to us.

3. If we ever elect to transfer or sell all or part of our company, we may disclose your personal information in connection with that sale.
4. We may disclose your personal information if required to do so by law enforcement or other legitimate public authority.

VII. TRANSFER & RETENTION OF YOUR PERSONAL INFORMATION

As a company with locations in the Netherlands, Romania, China, the United States of America and Mexico, we cannot limit our processing of an individual's personal data to the country in which that individual is based. As such, your personal information may be transferred to devices outside of your current jurisdiction.

If you are in the European Economic Area (EEA), for example, your personal data may be transferred to countries outside of the EEA. The legal basis for this is our legitimate interest in the maintenance of our website and our business. Regardless of the location of our processing, we will impose the same data protection safeguards that we deploy inside the EEA and implement appropriate measures to ensure that your personal data is protected.

In an effort to maintain your privacy, your personal information will only be retained for the, length of time necessary to fulfill the purpose for which the personal information was collected, and to fulfill any legal obligations. Occasionally, we will remove unique identifiers from your data for research purposes.

VIII. SECURITY OF YOUR PERSONAL INFORMATION

The security of your personal data is of utmost importance to us. We have implemented appropriate organizational and technical security measures to protect your personal data against unauthorized or unlawful processing and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage thereto.

IX. YOUR RIGHTS UNDER THE GDPR

Under the GDPR, you have various rights regarding our collection and retention of your personal information.

1. **Right to access:** you have the right to request copies of the personal information we have collected from you as well as information about the purpose of our collection of your personal information, and who the information is shared with. We will provide you with a copy of your personal information for free, but additional requests may incur a fee.
2. **Right to rectification:** if you believe any of the personal information we have collected is inaccurate or incomplete, you have the right to request we correct or complete that information.
3. **Right to erasure:** under certain conditions, you have the right to request that we erase your personal information.
4. **Right to restrict processing:** you have the right to request that we restrict processing of your personal information under certain circumstances.
5. **Right to object to processing:** you have the right to object to our processing of your personal information in certain circumstances.
6. **Right to data portability:** you have the right to have us provide your personal information to you in a secure, structured, commonly used, machine-readable format.
7. **Right to complain to a regulatory authority:** you have the right to contact the relevant supervisory authority regarding our handling of your personal information.
8. **Right to withdraw consent:** if the legal basis for the processing of your personal information is solely your consent, you have the right to withdraw your consent at any time.

If you wish to exercise any of these rights, please contact us at info@fromheadtotoes.nl. We may need additional information in order to confirm your identity before we can proceed with your request. In addition, some of these GDPR rights are subject to restrictions such as legal obligations or legal defense. If your request has been rejected, we will notify you accordingly. If you are not satisfied with the way we handle your rights or how we process your personal information, you may contact your local Data Protection authority and lodge a complaint.

X. YOUR RIGHTS UNDER THE CALIFORNIA CONSUMER PRIVACY ACT (CCPA)

If you are a resident of California, you have several rights with regard to the use of our website:

1. You have the right to know what categories of personal information we collect, how the information is collected, and the purpose for which we use the personal information.

2. You have the right to know whether your personal information is sold or disclosed to third parties.
3. You have the right to say “no” to the sale of your personal information.
4. You have the right to request from us any information regarding the disclosure of your personal information.
5. You have the right to request deletion of your personal information that has been collected in the last year.

In order to exercise any of these rights as a California resident, you can email us at **email address**. Within 30 days of receiving your verifiable request, we will disclose and deliver the requested information to you.

XI. DO NOT SELL MY PERSONAL INFORMATION

We do not sell your (or any) personal information obtained via our website and do not intend to sell your information in the future.

XII. CalOPPA COMPLIANCE

Our website does not monitor or respond to “Do Not Track” requests sent by your browser.

XIII. CHILDREN’S ONLINE PRIVACY PROTECTION ACT COMPLIANCE (COPPA)

In compliance with COPAA and the GDPR, we do not knowingly solicit, collect or use any information or market in any way to children under the age of 16. If we learn we have received personal information from a minor under the age of 16, we will delete this information and/or attempt to obtain parental consent. If you know we may have unknowingly collected information from a minor, please contact us at **email address**.

XIV. THIRD PARTY WEBSITES

Our website may contain links to third party websites, including third party advertisers, that may use cookies and web beacons. We do not control or maintain these third party websites and cannot guarantee the safety of any personal information you provide to these third parties. You accept we have no responsibility for their privacy practices. Each of these third party websites has their own Privacy Policy, and is not subject to the terms of this Privacy Policy. We therefore advise you to consult the privacy policies of these third party websites.

XV. CHANGES/UPDATES TO THIS PRIVACY POLICY

This Privacy Policy is current as of **11/05/2022**

You are advised to review this Privacy Policy periodically to check for any changes; however, we will notify you of any changes by posting our new Privacy Policy on this page. Any change will be displayed prominently here, and we will also update the last updated date to reflect any changes.

CONTACT US

This website is owned and operated by:

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info@fromheadtotoes.nl

If you have any questions about this Privacy Policy, you can contact us at:

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Last updated: 11/05/2022