

Franco Sarto Privacy Policy

FrancoSarto.com is a wholly owned division of Caleres, Inc. This Privacy Policy (“Privacy Policy” or “Policy”) describes how FrancoSarto.com collects, uses, and discloses personal information when you access or use our websites, mobile applications, or any other services that link to this Privacy Policy, visit us in our stores, or otherwise communicate with us.

This Policy also tells you about your rights and choices with respect to your personal information, and how you can reach out to us to get answers to your questions. Our privacy practices with respect to personal information about our employees, job applicants and contractors, past and present, are addressed through other internal company policies and procedures, and are outside the scope of this Policy.

California Consumer Notice of Collection

This Notice of Collection is provided to all California consumers subject to this Privacy Policy.

You can access specific topics in this Privacy Policy by clicking on the relevant links below:

- [Types of Information](#)
- [Use And Processing of Information](#)
- [Sources of Information](#)
- [Disclosures of Information](#)
- [Your Rights & Choices](#)
- [Cookies and Similar Tracking Technologies](#)
- [How We Protect Personal Information](#)
- [How Long Do We Keep Your Personal Information](#)
- [Other Important Information](#)
- [Contact Information](#)

Types of Information We Collect

The types of personal information we collect about you depends on how you interact with us. “Personal Information” refers to information that identifies, relates to, describes, or can be associated with you. The following provides examples of the type of information that we collect, and have collected in the preceding 12 months, and how we use that information.

- **Account Registration:** We collect basic identifying information such as your name, email address, postal address, and phone number when you create an account. Accounts can be used for easy checkout and to save your preferences and transaction history. We have an interest in providing account related functionalities to our users.
- **Commercial Information:** We collect basic identifying information such as your name, billing address, shipping address, email address, phone number, and payment information such as your credit card number when you place an order with us. We also collect certain commercial information regarding the products or services you have purchased, returned, exchanged, or considered, and your preferences, as well as your government-issued identifier in connection with return transactions. We have an interest in in fulfilling our contract with you for the provision of products or services, and to provide you receipts and order updates, send notifications to you related to your account, purchases, returns, and exchanges.
- **Demographic Information:** We may collect demographic information such as your **date of birth** or location. We have an interest in sending birthday promotions and gifts, and in understanding our customers.
- **Distance Information:** When you use one of our apps, we may collect your location from the GPS, Wi-Fi, and/or cell phone or device. We have an interest in understanding our users and providing tailored services. In some contexts our use is also based upon your consent to provide us with geolocation information.
- **Email Interconnectivity:** If you receive email from us, we use certain tools to capture data related to when you open our message, click on any links or banners it contains and make purchases. We have an interest in understanding how you interact with our communications to you.
- **Feedback/Support:** If you provide us feedback or contact us for support we will collect your name and e-mail address, as well as any other content that you send to us, in order to reply. We have an interest in receiving and acting upon your feedback or issues.
- **Mailing List:** When you sign up for one of our mailing lists we collect your email address or postal address. We have an interest in sharing information about our products or services.
- **Mobile Devices:** We may collect information from your mobile device such as unique identifying information that is sent from your device when visiting our

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website. We have an interest in identifying unique visitors, and in understanding how users interact with us on their mobile devices.

- **Gift Information:** Our websites and mobile applications provide the opportunity to send gifts to family or friends. In order to properly provide these services, we may collect your name and contact and payment information, as well as the name, email address, and/or shipping address of the gift recipient. We have an interest in fulfilling our contract with you.
- **Partner Promotion:** We may collect information that you provide as part of a co-branded promotion with another company. We have an interest in fulfilling our promotions.
- **Supplier Relationship Management:** We collect certain contact and related business information (name, email address, professional contact information) when you or your organization provides us with certain products or services. In some instances, we may collect certain background or screening information to the extent needed and in accordance with applicable law. We have an interest in administering our relationship with our suppliers and performing our contract with your organization.
- **Surveys:** When you participate in a survey we may collect information that you provide through that process. If the survey is provided by a third party, the third party's privacy policy applies to the collection, use, and disclosure of your information. We have an interest in understanding your opinions, improving our services, and collecting information relevant to our organization.
- **Sweepstakes/Contests:** When you participate in a sweepstakes or contest, we collect information that you provide through that process which may include your contact information to notify you if you are selected. We have an interest in operating contests and sweepstakes. In some contexts we are also required by law to collect information about those that enter into our sweepstakes, and we have an interest in complying with those laws.
- **Cookies and First Party Tracking:** We use cookies, web beacons, clear GIF, pixels, internet tags, and other similar tracking technologies (collectively "tracking technologies") to monitor how you interact with our websites and mobile applications. This may include which links you click on or identifying information about your device or browser. See our Cookies and Similar Tracking Technologies section below for more information. We have an interest in making our websites and mobile applications operate efficiently, providing account related functionalities, understanding how you interact with our websites and

mobile applications to better improve them, and maintaining security standards. We also have an interest in detecting and preventing fraud.

- **Cookies and Third Party Tracking:** We collect information about your internet activity so that we can provide advertising about products and services tailored to your interests on our websites, or on other websites. See our [Cookies and Similar Tracking Technologies section](#) below for more information. We have a legitimate interest in engaging in behavior-based advertising and capturing website analytics. You can manage your preferences via our [Cookie Preference Center](#).
- **Web logs:** We collect information from you, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the Internet is used), domain name, click-activity, referring website, and/or a date/time stamp for your visits.

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Use and Processing of Your Information

In addition to the specific situations discussed elsewhere in this policy, we use information in the following ways:

- To identify you when you visit our websites or our stores.
- To provide products and services you request or to process returns.
- To streamline the checkout process.
- To administer, maintain, evaluate, and improve our websites, mobile applications, and services, and to develop new products and services.
- To conduct research and analytics related to our websites, mobile applications and services, including combining any or all of the information that we collect or obtain.
- To respond to inquiries related to support, , or other requests.
- To send marketing and promotional materials, including information relating to our products, services, sales, or promotions.
- For internal administrative purposes, as well as to manage our relationships.
- 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 Franco Sarto and our customers, employees, or others.

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. For example, if you complete an online purchase we may collect your information to perform our contract with you, but we also collect your information as we have a legitimate interest in maintaining your information after your transaction is complete so that we can quickly and easily respond to any questions about your order. As a result our collecting and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

Sources of Information

We collect your personal information in the following ways, pursuant to applicable law:

- **Directly From You**, when you use our engage with our websites or mobile applications, shop with us, register for an account, contact us, respond to a survey, sign up to receive emails, text messages, and/or postal mailings.
- **Through Our Use of Cookies 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 technologies such as cookies, web beacons, clear GIF, pixels, internet tags, web server logs, and other data collection tools. For more information, please see the “Cookies and Similar Tracking Technologies” section below.
- **Through in-store and other offline technologies**. In some cases, we record customer service calls for quality assurance.
- **From Our Third-Party Partners**, including from third parties that we have partnered with to provide you the products and services that you have requested from us.
- **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.

Disclosures of Information

In addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations:

- **Affiliates and Acquisitions:** We may disclose your information with our corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires our company, business, or our assets, we will also disclose information to that company, including at the negotiation stage.
- **Other Disclosures with Your Consent:** We may ask if you would like us to disclose your information with other unaffiliated third parties who are not described elsewhere in this policy.
- **Compliance with Law or Other Legal Process:** We may disclose your information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also disclose your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the shipment of products to or the provision of services by a third party intermediary.
- **Public Forums:** You may have the opportunity to post comments, or reviews, in a public forum. If you decide to submit information on these pages, that information may be publicly available.
- **Partner Promotion:** We may offer contests, sweepstakes, or other promotions with third party partners. If you decide to enter a contest, sweepstakes, or promotion that is sponsored by a third party partner the information that you provide will be disclosed with us and with them. Their use of your information is not governed by this privacy policy.
- **Service Providers:** We may disclose your information with service providers. Among other things service providers may help us to administer our website, conduct surveys, provide technical support, process payments, and assist in the fulfillment of orders.
- **Third Party Applications/Websites:** We may disclose customer information (including personally identifiable information) with certain companies who may track user activity when you interact with our websites. The collection and use of

this information is subject to the third party's privacy policy. We have no control over the privacy practices of websites or applications that we do not own.

- **Social Media Platforms and Networks:** If you interact with us on social media or use features such as plugins, widgets, or and other tools made available by social media platforms or networks (including Instagram, Facebook, Twitter, Google, YouTube, and Pinterest) in connection with our websites or mobile applications, we 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.
- **De-identified Personal Information:** We may disclose or use aggregated or de-identified data for any lawful purpose. De-identified information is generally not considered to be personal information under applicable laws.

Your Rights & Choices

Where available to you in accordance with applicable data protection law, you can make the following choices regarding your personal information:

- **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send newsletters, surveys, offers, and other promotional materials to you, as well as targeted offers from third parties. You can choose to stop receiving promotional emails by following the unsubscribe instructions in e-mails that you receive. We will remove your name from our mailing lists after receiving your request within the timeframe permitted by law; however, you may still receive mailings that had been initiated prior to your name being removed. If you decide not to receive promotional emails, we may still send you transactional communications such as messages related to your account, order fulfillment, product ratings, or other service-related communications.
- **Promotional Mailings.** If at any time you do not want to receive offers and/or promotional mailings from us you can remove yourself from our mailing lists by emailing us at [\(Franco Sarto Customer Service\)](#) with "NO SNAIL MAIL-FRANCO SARTO" in the subject line along with your name, address and zip code. Please note that our mailings are prepared in advance of their being sent. Although we will remove your name from our mailing list after receiving your request, you may still receive mailings from us that had been initiated prior to your name being removed.

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- **Promotional Text Messages.** If you receive a text message from us that contains promotional information you can opt-out of receiving future text messages by replying “STOP.”
- **Changes To Your Personal Information.** We rely on you to update and correct your personal information. Our website allows you to modify or delete your account profile. If our website does not permit you to update or correct certain information contact us at the address described below.
- **Deletion Of Your Personal Information.** Typically, we retain your personal information for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law. If required by law, we will grant your request to delete information. However, when we delete personal information it will be removed from our active database, but it may remain in archives where it is not practical or possible to delete it. In addition, we may keep your personal information as needed to comply with our legal obligations, resolve disputes, and/or enforce any of our agreements.
- **Revocation of Consent.** We rely on the processing of personal information that you provide. Therefore, if you revoke your consent for the processing of personal information then we may no longer be able to provide you services. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity.
- **Access To Your Personal Information.** You have the right to request access to the personal information we hold about you, along with other information such as the purposes of the processing, the recipients or categories of recipients to whom the personal information has been or will be disclosed, the sources of the personal information, retention, and transfers of personal information. If required by law, upon request, we will grant you with reasonable access to the personal information that have about you. Where required by law, we may also transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Online Tracking.** Some web browsers incorporate a “Do Not Track” (DNT) or similar feature that signals to websites that a visitor does not want to have his/her online activity and behavior tracked. Not all browsers offer a DNT option and there is currently no industry consensus for how to recognize or respond to a DNT signal. For these reasons, Franco Sarto does not currently respond to DNT signals. Franco Sarto will endeavor to recognize commercially recognized opt out signals (e.g., Global Privacy Control). Recognition of this signal will only take place with respect to the device and/or browser that communicates the signal

- **Automated Processing.** Under certain circumstances, you have the right to object to a significant decision based solely on automated processing (i.e. without human intervention) unless that decision is required or authorized by law.
- **Right of Non-Discrimination/Relation.** We do not discriminate against individuals who exercise any of their rights described in this Privacy Policy, nor do we retaliate against individuals who exercise these rights.
- **Right to Opt Out of our Use of your Sensitive Personal Information (in certain instances and if permissible under applicable law).** We do not disclose sensitive personal information for purposes other than those which cannot be limited under applicable law.
- **Opt Out of the “Sale” or “Sharing” of Personal Information.** Our use of cookies or other tracking technologies is deemed a “sale” or “sharing” under California law (in this context “sharing” means cross contextual behavioral advertising) of personal information. As such, you can opt out of our use of tracking technologies and cookies by clicking the “Do not Sell or Share My Personal Information” button at the bottom of our websites.

The following categories of personal information disclosed are considered “sale”/ “sharing” under California law: direct identifiers, device information, and geolocation data.

The following categories of third parties to whom personal information was disclosed are considered “sale”/ “sharing” under California law: social media platforms and ad networks.

Please note that many of the above rights are subject to exceptions and limitations. Your rights and our responses will vary based on the circumstances of the request. If you choose to assert any of these rights under applicable law, we will respond within the time period prescribed by such law.

If you are located in the State of California in the United States, a person authorized to act on your behalf may make a verifiable request related to your personal information. If you designate an authorized person to submit requests to exercise certain privacy rights on your behalf, we will require verification that you provided the authorized agent permission to make a request on your behalf.

In any circumstances, your request must: (i) provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative of that person; and (ii) describe the request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request.

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To exercise your rights, please visit our Privacy Pages as follows:

For Deletion Requests, please go to our Delete My Information Center ([add link](#)), contact us at privacyrequests@caleres.com, or call us at 888-869-1053.

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For Access Requests, submit a verifiable consumer request to us by:
Emailing us at privacyrequests@caleres.com or calling us at 888-869-1053 and indicating you have a CCPA Information or Access request

Cookies and Similar Tracking Technologies

We and our third party partners (such as advertising and analytics providers) use cookies, web beacons, clear GIF, pixels, internet tags, and other similar tracking technologies (collectively, “tracking technologies”) to gather information when you interact with our websites, mobile applications, and email communications. Some 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 also permit third parties to use tracking technologies on our websites and mobile applications 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 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 tracking technologies are deemed to be a “sale”/“sharing” under California law, you can opt-out of these tracking technologies by following the instructions in the “Your Rights & Choices” section. Please note, some features of our websites may not be available to you as a result.

How We Protect Personal Information

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts designed to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of any unauthorized access to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of our websites and mobile applications permit you to create an account. If you create an account, you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

How Long Do We Keep Your Personal Information

We retain information about you and your relationship with us for as long as is needed to fulfill our legitimate business purposes outlined in this Policy. The specific periods for which we keep information about you vary depending on the nature of the information, why we need it, and whether the personal information is de-identified. We also consider the minimum necessary retention period prescribed by applicable laws, recommended by industry standards, and stated in contracts and other legal obligations.

Other Important Information

The following additional information relates to our privacy practices:

- **Transmission of Information to Other Countries.** If you are a consumer located outside of the United States, please be aware that your information may be processed in the United States, 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 information in a country other than your country of residence including, but not necessarily limited to, the United States.
- **Information for California Residents.** California residents may be entitled to ask us for a notice describing what categories of personal information (if any) we share with third parties or affiliates for direct marketing. If you would like a copy of such notice, please submit a written request to us as described in the “Contact Information” section below and indicate that you are a California resident making a “California Shine the Light” inquiry.
- **Information for Nevada Residents.** Nevada law allows Nevada residents to opt-out of the sale of certain types of personal information. We do not currently sell personal information as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to opt-out of sales and we will record your instructions and incorporate them in the future if our policy changes. Opt-out requests may be sent to privacyrequests@caleres.com.
- **Third Party Applications/Websites.** Our websites may contain links and references to other websites administered by unaffiliated third parties. This Policy does not apply to such third party websites. When you click a link to visit a third party website, you will be subject to that website's privacy practices. We encourage you to familiarize yourself with the privacy and security practices of any linked third party websites before providing any personal information on those websites.
- **Children.** FrancoSarto.com is not targeted to children. Franco Sarto will not knowingly collect any personally identifiable information from children under the

age of 13 and our websites and our services are not directed to children under the age of 13. If a child under 13 submits personal information to Franco Sarto and we learn that the information is from a child under age 13, we will attempt to delete the information as soon as possible. In addition, Franco Sarto does not knowingly sell the personal information of minors under the age of 16.

- **Changes To This Privacy Policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information. Our privacy policy includes an “effective” and “last updated” date. The effective date refers to the date that the current version took effect. The last updated date refers to the date that the current version was last substantively modified.
- **Accessibility.** If you are visually impaired, you may access this notice through your browser’s audio [reader](#).

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Contact Information

If you have any questions, comments, or complaints concerning our privacy practices please contact us at the appropriate address below. We will attempt to respond to your requests and to provide you with additional privacy-related information.

Franco Sarto
Attn: Legal Department
8300 Maryland Avenue
St. Louis, MO 63105
Email: privacyrequests@caleres.com

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Effective: May 13, 2021

You can download a PDF of this document here: [Franco Sarto Privacy Policy](#)