

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.

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

- [Types Of Information We Collect](#)
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TYPES OF INFORMATION WE COLLECT

Identifiers

Example Of Information Collection

- Basic identifying information such as name, email address, postal address, billing address, shipping address and phone number

Purpose For Collection

- Providing account related functionalities
- To fulfill your contract for the provision of products or services, to ship the goods to you or your provided recipient, to provide receipts and order updates, send notifications to you about your account, purchases, returns and exchanges
- To receive and act upon your feedback or issues
- To share information about our products and services
- To operate contests and sweepstakes
- To fulfill our promotions
- To conduct surveys or contests and to understand your opinions
- To serve targeted advertisements

Commercial Information

Example Of Information Collection

- Payment information such as credit or debit card number. This information may be collected by our consumer care representatives to help with completing your order. However, typically this information is collected by our payment processor partners.
- 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.

Purpose For Collection

- To fulfill your contract for the provision of products or services, to provide receipts and order updates, send notifications to you about your account, purchases, returns and exchanges.

Demographic Information

Example Of Information Collection

- Date of birth or your location

Purpose For Collection

- To send birthday promotions and gifts
- To understand and analyze our customers

Internet or other Network Activity Information

Example Of Information Collection

- 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.
- Mobile device information such as unique identifying information that is sent from your device when visiting our website or one of our stores.
- 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 and other websites. This may include which links you click on or identifying information about your device or browser
- With web logs we may collect 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 visit.
- Information about your interactions with our online services and advertisements, including browsing activities and data that reflects the content you have accessed, clicked on, or viewed, use of our accessibility features, and information about the websites or apps visited immediately before or after interacting with our online service

Purpose For Collection

- To understand how you interact with our communications
- To identify unique visitors, and to understand how users interact with their mobile devices
- To operate our websites and mobile applications efficiently, provide account related functionalities, understand how you interact with our websites and mobile applications to better improve them, maintain security standards
- To detect and prevent fraud

- To serve targeted advertisements and engage in behavior-based advertising and capture web analytics

Characteristics of protected classifications under State or Federal law.

Example Of Information Collection

- Age

Purpose For Collection

- To send birthday promotions and gifts
- To understand and analyze our customers and provide tailored services

Geolocation Data

Example Of Information Collection

- Your location from the GPS, Wi-Fi, and/or cell phone, computer, or device to determine your distance from one of our stores.

Purpose For Collection

- To understand our users and provide tailored services.
- In some contexts, our use is also based on your consent to provide us with geolocation information.
- To serve targeted advertisements

Audio, electronic, visual, thermal, olfactory, or similar information

Example Of Information Collection

- Audio recordings of customer service calls
- Video recordings (CCTV) of stores

Purpose For Collection

- For quality assurance purposes
- For safety, security, fraud, loss prevention and operation purposes in store.

Professional or employment-related information

Example Of Information Collection

- Business/professional contact information (Name, email address, phone number)
- Employment position.
- Background or screening information to the extent needed and in accordance with applicable law

Purpose For Collection

- To maintain our relationship with our suppliers, subcontractors and service providers and performing our contract with the organization

Sensitive Personal Information

Example Of Information Collection

- Account login and password
- Credit card/debit card number and pin. This information may be collected by our consumer care representatives to help with completing your order. However, typically this information is collected by our payment processor partners.

Purpose For Collection

- Provide account related functionalities to our users
- To fulfill your contract for the provision of products or services, to provide receipts and order updates, send notifications to you about your account, purchases, returns and exchanges.

Inferences drawn from any of the information identified above

Example Of Information Collection

- We use the information listed above, with the exception of Sensitive Personal Information, to draw inferences about your preferences

Purpose For Collection

- We use the information listed above to draw inferences about your preferences

USE AND PROCESSING OF YOUR INFORMATION

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

- To identify you when you visit our websites, mobile applications, or our stores and personalize your experience.
- 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 or engage with our websites or mobile applications, shop with us, register for an account, contact us, respond to a survey, post on our site, sign up to receive emails, text messages, and/or postal mailings. For example, we collect and record information and content you provide to us over the phone, email, or online chat or when you communicate with us using any other service or communication method.
- 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. We may also use Closed Circuit Television or CCTV in our stores for safety, security, fraud, loss prevention, and operational purposes.
- 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.
- Additionally, if you have given Franco Sarto permission to store your payment information, your credit card issuer may provide us with updated payment information (including credit card number and expiration date) in connection with the credit card issuer's account updater service. We use this information to perform our contract with you. The credit card issuer's use of your information is not governed by this privacy policy, but by their own privacy policies.

DISCLOSURES OF INFORMATION

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

1. Affiliates. We may disclose your information to our corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common control) to provide you with our products and services.

2. Acquisitions. If another company acquires our company, business, or our assets, we will also disclose your information to that company, including at the negotiation stage.

3. 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.

4. 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.

5. 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.

6. 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 shared with us and with them in order to carry out the promotion. A third-party partner's use of your information is not governed by this privacy policy.

7. Service Providers and Contractors. We may disclose your information to service providers and contractors for processing for a specific business purpose on our behalf. Among other things service providers and contractors may help us to administer or host our website, assist in daily business operations, provide professional services, distribute communications, manage promotions, provide data analytics and logistics, operate advertising and marketing campaigns, conduct surveys, provide technical support, process payments, host or store data, assist with fraud prevention, and assist in the fulfillment of orders.

8. 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.

9. Social Media Platforms and Advertising 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, the relevant platform/entity may collect or have access to your personal information. This information is disclosed for analytics and targeted advertising purposes. 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.

10. 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 PRIVACY CHOICES

You can make the following choices regarding your personal information:

1. **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 or by changing your preferences in your account. 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.
2. **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 privacyrequests@caleres.com 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.
3. **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."

YOUR PRIVACY RIGHTS

Residents of certain states have additional privacy rights, as outlined further below. Exemptions may apply. Please note that many of the above below 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.

Consumer privacy rights for residents of these states may include:

1. **Right to Delete.** You have the right to request that we deleted the personal information we collected about you. 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. To submit your Request to Delete please visit our [Delete My Information Center](#), contact us at privacyrequests@caleres.com or call us at 1-888-837-8892.

2. Right to Correct. You have the right to request to have inaccurate information about you corrected. We rely on you to update and correct your personal information. Our website allows you to modify or delete your account profile. Note that we may keep historical information in our backup files as permitted by law. If our website does not permit you to update or correct certain information contact us privacyrequests@caleres.com or call us at 1-888-837-8892.

3. Right to Opt-Out of Sales and Sharing. You have the right to opt-out of our sale or sharing as defined under applicable law or targeted advertising of certain person information. Our use of cookies or other tracking technologies may be deemed a "sale" or "sharing" under applicable law (in this context "sharing" means cross contextual behavioral advertising or targeted advertising) of personal information. As such, you can opt out of our use of tracking technologies and cookies by using this link - [Do Not Sell or Share My Personal Information](#).

4. The following categories of personal information disclosed are considered "sale" / "sharing" under applicable law: direct identifiers, internet or other network activity information, and geolocation data.

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

6. Right of Non- Discrimination. 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.

7. Right to Know. 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. To submit an Access Request, submit a verifiable consumer request by emailing us at privacyrequests@caleres.com or calling us 1-888-837-8892.

8. Right to Opt Out of Our Use of Your Sensitive Personal Information (in certain instances and if permissible under applicable law). We do not use or disclose sensitive personal information for purposes other than to provide the goods or perform the services you have requested or as otherwise authorized by applicable law.

9. Revocation of Consent. Under certain state laws, you have the right to revoke your consent for processing of personal information. 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. To revoke your consent, please email us at privacyrequests@caleres.com.

10. 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), including profiling, which produces legal effects or similarly significantly affects you, unless that decision is required or authorized by law. To object to such processing, please email us at privacyrequests@caleres.com.

11. Appeal of Decision. You may appeal our decision with respect to a request you have submitted by emailing us at privacyrequests@caleres.com.

Authorized Agent. 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.

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.

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 applicable law, you can opt-out of these tracking technologies by following the instructions in the "Your Privacy Rights" section above. Please note, some features of our websites may not be available to you as a result. You can also opt-out of certain types of tracking technologies by using this link - [Do Not Sell or Share My Personal Information](#).

If you arrive at our websites by "clicking through" from another website, certain information about you that you provided to that other website, such as the terms you were searching on that led you to our websites, may be transmitted to us and we may use it. You should review the privacy policy of any website from which you reached our websites to determine what information that website collects and for what purpose(s) the website operators use that

information. We may retain information about you provided to us by other websites and will use it in accordance with this Privacy Policy. Such information may be associated with other personal information.

We also use third-party web analytics tools to enhance user experience by optimizing the efficiency and quality of the services we provide on our website. These analytics tools use cookies and similar technologies to collect and analyze information related to user behavioral metrics on the website such as user inputs, mouse movements, clicks, scrolling, access times, duration of visit, pages viewed, IP address (including approximate location), operating system and page reloading. These tools provide us with insight into what works and what doesn't work for users of the services. For example, they allow us to identify and fix technical errors such as broken links that impair the functionality of the services. These analytics tools help us to reconstruct the user experience and make improvements. By continuing to use our website, you consent to the collection and use of your information in this manner.

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 customer 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.
- **Co-branded, Co-Sponsored, or Cross-promotional offerings.** If you choose to participate in a co-branded, co-sponsored, or cross-promotional offering, the brand, sponsor, or other third party involved in that offering may use your information for their own purposes, including advertising and marketing. You must contact the relevant third party directly to exercise your opt-out choices with respect to the third party's use of your information.
- **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 by going to emailing us at 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 or share 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.
- **For our customer residing outside of the U.S.** We do not market for direct sale to customers in regions outside the United States, including the European Economic Area (EEA), Switzerland and the United Kingdom (UK). Purchases made through our website or app that ship to locations outside the United States are processed by a third party vendor, not Caleres. Any personal information associated with those orders will be received by Caleres on behalf of the third party vendor. Caleres may access personal information controlled by the third party vendor to fulfill orders.

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.

For customers in the United States:

U.S. by email: Contact us: [Customer Care Contact Form](#)
privacyrequests@caleres.com

U.S. by phone:
1-888-837-8892

U.S. by mail:
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