**Privacy Policy**

**My Pro SkinCare by Steel Cosmetics, International, Inc. Privacy Policy**

**Introduction**

This Privacy Policy will help you understand what information we collect and use at Steel Cosmetics, International, Inc. (“Steel” and “My Pro SkinCare”), and the choices you have associated with that information.  When we refer to “Steel,” or “My Pro SkinCare,” “we,” “our,” or “us” in this policy, we are referring to My Pro SkinCare and Steel Cosmetics, International, Inc. a Delaware USA corporation, and any of its subsidiaries and affiliates, which provides the Services to you.  The “Services” refers to the applications, services, and websites (marketing and product) provided by Steel. Steel may, from time to time, introduce new products and services.  To the extent that these new products and services affect this policy, we will notify you as described in Section 8 below.  The use of information collected through our Services shall be limited to the purpose of providing the Services for our customers and as specified herein.

If you have any questions about this Privacy Policy or our practices, please contact us at info@myproskincare.com or [800.711.5679](1-800-558-5571)
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**1. Information We Collect and Receive**

We collect several different types of information to provide Services to you:

**Customer Account and Registration Data:**  This includes information you provide to create your account with us or register for accounts, events, place orders, webinars, surveys, etc. and may include, first and last name, company name, addresses, cell phone numbers for SMS messaging, billing information, a password, and a valid email address.

**Service Data (including order and customer data):**When you use our Services, we receive information generated through the use of the Services, either entered by you or others who use the Services with you (for example, customer data, order information, etc.), or from the Service infrastructure itself, (for example, tracking of users / visitors to the sites or other platforms provided with the Services, marketing information, etc.)  We may also collect usage and log data about how the Services are accessed and used, including information about the device you are using the Services on, IP addresses, location information, language settings, what operating system you are using, unique device identifiers, and other diagnostic data to help us support the Services.

**Third-party Data:**  We may receive information about you from other sources, including publicly available databases or third-parties from whom we have purchased data, and combine this data with information we already have about you.  We may also receive information from other affiliated companies that are a part of our corporate group.  This helps us to update, expand, and analyze our records, identify new prospects for marketing, and provide products and services that may be of interest to you.

**Location Information: We** collect your location-based information for the purpose of providing and supporting the Service and for fraud prevention and security monitoring.  If you wish to opt-out of the collection and use of your location information, you may do so by turning it off on your device settings.

**Device Information: When** you use our Services, we automatically collect information on the type of device you use, operating system version, and the device identifier (or "UDID").

**2. How We Use the Information We Collect and Receive**

Steel may access and use the data we collect as necessary (a) to provide and maintain the Services; (b) to address and respond to service, security, and customer support issues; (c) to detect, prevent, or otherwise address fraud, security, unlawful, or technical issues; (d) as required by law; (e) to fulfill our contracts; (f) to improve and enhance the Services; (g) to provide analysis or valuable information back to our Customers and users.
Some specific examples of how we use the information:

* Create and administer your account
* Send you an order confirmation by letter, email or, when selected, SMS messaging
* Facilitate and improve the usage of the Services you have ordered
* Assess the needs of your business to determine suitable products
* Send your product updates, marketing communication, and Service information by letter, email or, when selected, SMS messaging
* Respond to customer inquiries and support requests by letter, email or, when selected, SMS messaging
* Conduct research and analysis
* Display content based upon your interests
* Analyze data, including through automated systems and machine learning to improve our Services and/or your experience
* Provide you information about your use of the Services and benchmarks, insights and suggestions for improvements by letter, email or, when selected, SMS messaging
* Market services of our third-party business partners by letter, email or, when selected, SMS messaging

Steel also collects and stores site visitor information and order information to fulfill our obligation to our customers and provide the Services.  Steel will retain your information for the longer of the time (i) that your account with us is active, and (ii) needed to comply with our legal obligations to you and others, to resolve disputes, and enforce our agreements.

Upon registering with Steel and/or its affiliated entities, you will be automatically enrolled in our email service, and can elect to communicate by SMS messaging, to receive promotional emails, texts, and mailings from Steel unless you opt-out.  You can unsubscribe from the email or SMS service at any time after registration by simply clicking on the "Unsubscribe" link at the bottom of any email and follow the specified instructions to opt-out or contact us to opt-out of SMS messaging. You will then be unsubscribed to such services within 10 business days.  To unsubscribe to mailings, please contact us at info@myproskincare.com. While you may opt-out of these specific Services, Steel will retain your email address and cell phone number to send you transactional emails pertaining to your order, your account, etc. unless you cancel your account.

If you wish to cancel your account or for us to stop providing you Services, or if we hold personal information about you and you want it to be removed from our database or inactivated, please contact us.  Unless otherwise agreed by us in writing, we may always maintain one copy of all information collected by us for legal or audit purposes.

This Privacy Policy does not apply to content, business information, ideas, concepts, or inventions emailed to Steel or shared as content on our website.
We are committed to protecting the privacy of children. Neither Steel nor any of its services are designed or intended to attract children under the age of 13.  We do not collect Personally Identifiable Information from any person we know is under the age of 13.

**3. Analytics, Cookies, and Other Web Site Technologies**

Steel is continuously improving our websites and products through the use of various third-party web analytics tools, which help us understand how visitors use our websites, desktop tools, and mobile applications, what they like and dislike, and where they may have problems.  While we maintain ownership of this data, we do not share this type of data about individual users with third parties that are not affiliated with us or that are business partners. Our website uses cookies to keep track of items you put into your shopping cart, including when you have abandoned your checkout. This information is used to determine when to send cart reminder messages via SMS messaging.

*Geolocation and Other Data:* We may utilize precise Geolocation data but only if you specifically opt-in to the collection of that data in connection with a particular Service.  We also use information such as IP addresses and cell phone data to determine the general geographic locations areas of our visitors.  The web beacons used in conjunction with these web analytics tools may gather data such as what browser or operating system a person uses, as well as, domain names, MIME types, and what content, products and Services are reviewed or downloaded when visiting or registering for services at one of our websites or using one of our mobile applications.

*Google*[*®*](https://www.universalcompanies.com/pages?preview_key=192329a54f955ae13fbe44144b8a9798#_ftn1)*Analytics and Adobe Marketing Cloud:* We use Google Analytics as described in [“How Google uses data when you use our partners' sites or apps.”](https://www.google.com/policies/privacy/partners/)  You can prevent your data from being used by Google Analytics on websites by installing the Google Analytics opt-out browser add-on located at this link: <https://tools.google.com/dlpage/gaoptout>.  We also employ IP address masking, a technique used to truncate IP addresses collected by [Google Analytics](https://www.google.com/policies/privacy/partners/) and store them in an abbreviated form to prevent them from being traced back to individual users.  Portions of our website may also use Google Analytics for Display Advertisers including DoubleClick or Dynamic Remarketing which provide interest-based ads based on your visit to this or other websites.  You can use Ads Settings to manage the Google ads you see and opt-out of interest-based ads.  You can opt out of use of this information as described below.

*Tracking Technologies:* Steel and our partners use cookies and similar tracking technologies to track user traffic patterns and hold certain registration information.  Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.  If you wish to not have the information these technologies collect used for the purpose of serving you targeted ads, you may opt-out at our [contact](https://www.universalcompanies.com/pages/contact-us) page. The Help menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, and how to disable cookies altogether.  You can still review the website if you choose to set your browser to refuse all cookies; however, you must enable cookies to establish an account and to install the Services.  To manage Flash cookies, please click the following: <http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager03.html>.

*Examples of Cookies We Use:*

|  |  |  |
| --- | --- | --- |
| Cookie Type | Purpose | Description |
| Session Cookies | We use these cookies to operate our websites. | Some cookies are essential for the operation of Steel Company websites. If a user chooses to disable these cookies, the user will not be able to access all of the content and features. |
| Preference Cookies | We use these cookies to remember your preferences. | When you register at a Steel company website, we use cookies to store unique, randomly assigned user IDs that we generate for administrative purposes. These cookies enable you to enter the Steel Company sites without having to log on each time. |
| Advertising Cookies | These cookies are used to serve you with advertisements that may be relevant to you and your interests. | We use cookies to make advertising more engaging to users, as well as to assist in reporting on marketing program performance and analytics |
| Security Cookies | These cookies are used for general security purposes and user authentication. | We use security cookies to authenticate users, prevent fraudulent use of login credentials, and protect user data from access by unauthorized parties. |

***Mobile Analytics:***
We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone.  This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from.  We do not link the information we store within the analytics software to any personally identifiable information you submit within the mobile application.

***Social Media:***
Our sites include social media features, such as Facebook, Google, and Instagram “share” buttons.  These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly.  These services will also authenticate your identity and provide you with the option to share certain personal information with us such as your name and email address to pre-populate our sign-up form or provide feedback.  Your interactions with these features are governed by the Privacy Policy of the company providing them.

**4. Information Sharing**

Ensuring your privacy is important to us.  We do not share your personal information with third parties except as described in this Privacy Policy.  We may share your personal information with (a) third-party service providers; (b) business partners; (c) affiliated companies within our corporate structure; and (d) as needed for legal purposes.  Third-party service providers have access to personal information only as needed to perform their functions, and they must process the personal information in accordance with this Privacy Policy.

Examples of how we may share information with service providers:

* Fulfilling orders and providing the services
* Payment processing and fraud prevention
* Providing customer support
* Sending marketing communications
* Conducting research and analysis
* Providing cloud computing infrastructure

SMS consent / mobile information will not be shared to third parties for marketing/promotional purposes.

Examples of how we may disclose data for legal reasons:

* As part of a merger, sales of company assets, financing or acquisition of all or a portion of our business by another company where customer information will be one of the transferred assets.
* As required by law, for example, to comply with a valid subpoena or other legal process; when we believe in good faith that disclosure is necessary to protect our rights, or to protect your safety (or the safety of others); to investigate fraud; or to respond to a government request.

We may also disclose your personal information to any third-party with your prior consent.

Under California Civil Code §§1798.83-1798.84, California residents are entitled to ask for a notice of what categories of personal information Steel shares with third parties.  That notice will identify the categories of information shared and include a list of the third parties with which the information was shared.  If you are a California resident and would like a copy of this notice, you may submit a written request to the following address: info@myproskincare.com.  Please allow 45 days for a response.

**5. Communications**

Steel may need to communicate with you for a variety of different reasons:

* Responding to your questions and requests.  If you contact us with a problem or question, we will use your information to respond.
* Sending your Service and administrative emails and messages.  We may contact you to inform you about changes in our Services, our Service offerings, and important Service-related notices, such as billing, security, and fraud notices.  These emails and messages are considered a necessary part of the Services, and you may not opt-out of them.
* Sending emails about new products or other news about Steel and its affiliated companies that we think you would like to hear about either from us or from our business partners.  You can always opt-out of these types of messages at any time by clicking the unsubscribe link at the bottom of each communication.
* Conducting surveys.  We may use the information gathered in the surveys to enhance and personalize our products, services, and websites.
* Offering referral programs and incentives, which allow you to utilize email, text, or URL links that you can share with friends or colleagues.

**6. Accessing Your Data**

Our customers can always review, update, or change personal information from within their account. Steel will also, when you request, provide you with information about whether we hold, or process on behalf of a third-party, any of your personal information.  Please contact us at info@myproskincare.com, if you need assistance in reviewing your information.  Steel will respond to your access request to review the information we have on file for you within a reasonable time.

We may also collect information on behalf of our customers, to provide the Services, and we may not have a direct relationship with the individuals whose personal data is processed.  If you are a customer or end-user of one of our customers, please contact them (as the data controller) directly if: (i) you would no longer like to be contacted by them; or (ii) to access, correct, amend, or delete inaccurate data.  If requested to remove data by our customer, we will respond within a reasonable timeframe.

We may transfer personal information to companies that help us provide our Service, and when we do, these transfers to subsequent third parties are covered by appropriate transfer agreements.  We will retain personal data we process on behalf of our customer as needed to provide Services to our customer.  Also, we will retain this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Steel is headquartered in the United States of America and maintains a global infrastructure.  Information that we collect and maintain may be transferred to, or controlled and processed in, the United States and/or other countries around the world.  When you provide us with information, or use our website(s) and services, you consent to this transfer.  We will protect the privacy and security of personal information we collect in accordance with this Privacy Policy, regardless of where it is processed or stored.

**7. Security**

**Steel follows generally accepted standards to protect the personal information submitted to us, both during transmission and once it is received, however, no security measure is perfect.  We recommend safeguarding your password, as it is one of the easiest ways you can manage the security of your own account – remember that if you lose control over your password, you may lose control over your personal information.**

**8. Changes to this Statement/Contact Us**

We may update this Privacy Policy to reflect changes to our information practices.  If we make any material changes we will provide notice on this website, and we may notify you by email (sent to the e-mail address specified in your account), prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.  If you continue to use the Services after those changes are in effect, you agree to the revised policy.

If you have any other questions about this policy please contact Steel  or call us at [1-800-711-5679](1-800-558-5571) or email us info@myproskincare.com

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