

Blu Privacy Policy

Effective Date: January 1, 2022

Welcome to Blu’s (“**Blu**,” “**us**,” “**we**,” or “**our**”) website, which is owned, operated and controlled by ITG Brands, LLC (“**ITGB**”). This Privacy Policy applies to your use of our websites (including www.blu.com), and to other information we collect online (together, our “**Service**”). If you are an employee, job applicant, or if we collected your Personal Information in the context of your employment at another business and you have questions about how we use your Personal Information, please contact us as provided below.

Please read our Privacy Policy and Terms of Use carefully before using the Service. By using the Service or otherwise providing Personal Information to us, you agree to the Service’s [Terms of Use](#) and consent to Blu’s data collection, use, and disclosure practices. If you do not agree, please discontinue use of the Service.

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PERSONAL INFORMATION WE COLLECT AND WHY WE COLLECT IT

“Personal Information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you. Personal Information does not include information that is publicly available, de-identified, or aggregated.

The chart below summarizes the types of Personal Information we collect and why we collect it. Blu may use your Personal Information for any purposes not inconsistent with Blu’s statements under this Privacy Policy, or otherwise made by us in writing at the point of collection, and not prohibited by applicable law, including the purposes listed below.

CATEGORY OF PERSONAL INFORMATION	EXAMPLES	PURPOSE(S) FOR COLLECTION
Contact Information	Name, title, alias, postal address, phone number, email address, state ID card number	<p>To allow you to participate in the features we offer on the Service</p> <p>To process your orders</p> <p>To maintain your accounts with us</p> <p>To communicate with you, including about our products, your orders, updates to our terms and policies, and to obtain your feedback</p> <p>To send you marketing materials and advertisements</p> <p>To send you relevant coupons</p> <p>To allow you to participate in promotions, sweepstakes, contests, and rewards programs</p> <p>Auditing, research and analysis, to maintain and improve the Service, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p>
Other Identifiers	Username and password for our Service, security question/answer combinations, IP address, mobile device identifiers, signature, social media usernames	<p>To allow you to participate in the features we offer on the Service</p> <p>To process your orders</p> <p>To maintain your accounts with us</p> <p>To recognize you when you use our Service</p> <p>To show you relevant ads while you browse the internet or use social media</p> <p>To send you relevant coupons</p> <p>To allow you to participate in promotions, sweepstakes, contests, and rewards programs</p> <p>Auditing, research and analysis, to maintain and improve the Service, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p>
Payment Information	Credit card or other payment information	<p>To process your orders</p> <p>Auditing, research and analysis, to maintain and improve the Service, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p>
Commercial Information	Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, purchase channel (online or retail), communication channel preferences, coupon and loyalty program usage, information from surveys, promotions and product reviews	<p>To allow you to participate in the features we offer on the Service</p> <p>To process your orders</p> <p>To provide you with appropriate products and recommendations</p>

		<p>To help you find relevant products more quickly</p> <p>To tailor our communications to you</p> <p>To provide customer service and support</p> <p>To send you relevant coupons</p> <p>To allow you to participate in promotions, sweepstakes, contests, and rewards programs</p> <p>To improve the Service, and our products, marketing and advertising</p> <p>Auditing, research and analysis, to maintain and improve the Service, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p>
Demographic Information	Age, birth date, gender, languages spoken	<p>To allow you to participate in the features we offer on the Service</p> <p>To process your orders</p> <p>To send you relevant marketing materials and advertisements</p> <p>To tailor our communications to you</p> <p>To improve the Service, and our products, marketing and advertising</p> <p>Auditing, research and analysis, to maintain and improve the Service, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p>
Internet or Other Electronic Network Activity Information	Browser type and language, operating system, internet or mobile network provider, website access time, duration of visit, referring website address, browsing and search history on our websites, webpages viewed immediately before and after our websites, information related to your interactions with our websites, social media pages, emails, online chat, text message communications, and advertisements	<p>To allow you to participate in the features we offer on the Service</p> <p>To facilitate, manage, personalize, and improve your website experience</p> <p>To provide you with appropriate products and recommendations</p> <p>To show you relevant ads while you browse the internet or use social media</p> <p>To improve the Service, and our products, marketing and advertising</p> <p>To send you relevant coupons</p> <p>To allow you to participate in promotions, sweepstakes, contests, and rewards programs</p> <p>Auditing, research and analysis, to maintain and improve the Service, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p>
Geolocation Data	Your physical location based on information you provide directly or inferred from your IP address	<p>To allow you to participate in the features we offer on the Service</p> <p>To process your orders</p>

		To deliver coupons to you Auditing, research and analysis, to maintain and improve the Service, and for any other internal business purposes
Audiovisual Information	Audio data collected when you call our customer service numbers	To provide you with customer service To improve our products and the Service
Communications with Us	The contents of your communications with us via phone, email, text message, chat, or other means (such as survey responses, product reviews, and comments on our blog and social media pages)	To communicate with you, including about our products, your orders, to provide answers to your questions, and to obtain your feedback To provide customer service and support To improve the Service, and our products, marketing and advertising To allow you to participate in promotions, sweepstakes, contests, and rewards programs Auditing, research and analysis, to maintain and improve the Service, and for any other internal business purposes To detect and prevent fraud against you and/or us
Inferences About You from Any Other Category of Information We Collect	Information reflecting your preferences, characteristics, trends, or attitudes	To provide you with appropriate products and recommendations To improve the Service, and our products, marketing and advertising To provide you with a better website experience Auditing, research and analysis, to maintain and improve the Service, and for any other internal business purposes To detect and prevent fraud against you and/or us

We may use and share information for any purpose if it is publicly available, de-identified, or aggregated with other information so that it can no longer identify you.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect your Personal Information through various means, including when you directly provide it to us and automatically through your use of our Service. We may also collect Personal Information about you from our Service Providers and from third parties. In some instances, you may be able to choose what information to provide, but sometimes we require certain information from you to use features of our Service.

Information that You Provide

We collect Personal Information about you directly when you:

- Register or maintain an account with us
- Purchase products from us

- Enter search terms or other information through our Service
- Subscribe to receive our notifications
- Exchange communications with us by mail, email, phone, etc.
- Post comments to our online communities
- Obtain customer service or technical support
- Participate in promotional activities (coupons, special offers, sweepstakes, loyalty programs, rewards, surveys, contests, etc.)
- Post reviews or other information about our products or Services
- Connect with us via social media

Information Collected Automatically

Blu, our Service Providers, and/or third-party services also automatically collect certain information about you when you access or use the Service (“**Usage Information**”). Usage Information may include your IP address, device identifier, browser type, operating system, information about your use of the Service, and data regarding network connected hardware (e.g., computers or mobile devices), the domain name of the website that allowed you to navigate to the Service, search engines used, the length of time spent on the Service, the pages you looked at on the Service, the address (or “URL”) of the websites you visited before and after visiting the Service, the frequency of your visits to the Service, and certain other available information. The methods we use to collect Usage Information include:

- **Log Files.** Log information is data about your use of the Service, such as IP address, browser type, Internet service provider, referring/exit pages, operating system, date/time stamps, and related data, which may be collected and stored in log files.
- **Cookies.** We use cookies and other tracking technologies (such as web beacons) to collect and store information about your interactions with our website, including information about your browsing behavior. Our website also supports third-party cookies placed by our Service Providers, affiliates, and advertising partners.

Cookies are small files that a website transfers to your device through a web browser that enable the site’s or a third party’s systems to recognize your device and to capture and remember certain information. Web beacons (also known as tracking pixels) are tiny graphics embedded invisibly on a webpage or in an email that may be used to deliver or communicate with cookies, to count users who have visited certain pages, and to understand usage patterns. In general, our website use cookies and other tracking technologies as follows:

- Where necessary to run our website, for example by allowing you to log in and add items to your cart
- To optimize the functionality of our website, including by personalizing content for you, greeting you by name and remembering your preferences (e.g., your choice of language or region)
- For analytics purposes—for example, to help us understand how our website is used, to see what products most interest you, and determine how best to market our products to you. More information on website analytics is provided below.
- For purposes of ad targeting and marketing. These cookies collect information about your browsing behavior on our website in order to show you interest-based advertising when you visit other websites or use social media.

- To determine if you open or act upon our email messages. Information on unsubscribing from our commercial email communications is provided below.
- To obtain information about your interactions with our online advertisements, such as whether you clicked on an ad and the website where you may have seen the ad.

Cookies vary in how long they last. “Session cookies” terminate shortly after you terminate your internet session. “Persistent cookies” are stored on your device until a set expiration date. We use both session cookies and persistent cookies on our website.

- **Web Beacons (“Tracking Pixels”).** Web beacons are small graphic images, also known as “Internet tags,” “clear GIFs,” or “Pixel Tags”) embedded in web pages and email messages. Web beacons may be used, without limitation, to count the number of visitors to the Service, to place cookies, to monitor how users navigate the Service, and to count content and advertising views.
- **Embedded Scripts.** An embedded script is programming code designed to collect information about your interactions with the Service. It is temporarily downloaded onto your computer from Blu’s web server, or from a third party with which Blu works and is active only while you are connected to the Service and deleted or deactivated thereafter.
- **Location-identifying Technologies.** GPS (global positioning systems) software, geo-filtering and other location-aware technologies locate you (sometimes precisely), or make assumptions about your location, for purposes such as verifying your location and delivering or restricting/providing content based on your location. If you have enabled GPS or use other location-based features on the Service, your device location may be tracked by us and third parties. Our store finder feature may access and use information about your device location (such as based on IP address or GPS, as applicable), or your account information, to suggest appropriate store locations. We also provide coupons based on your location. Content on our Service may be personalized based on various information we may have about you to try to provide you with more location-relevant content.
- **Device and Activity Monitoring.** Technologies that monitor, and may record, certain of your interactions with the Service, and/or collect and analyze information from your device, such as, without limitation, your operating system, plug-ins, system fonts, and other data, for purposes such as identification, security, fraud prevention, troubleshooting, tracking and/or improving the Service and customizing or optimizing your experience on the Service.

Information We Collect from Other Sources

Blu may also obtain information about you from other sources, including our Service Providers. We also may obtain your Personal Information from our parent, subsidiary, and sister companies. In some circumstances, we obtain Personal Information about you from third parties, including business partners, resellers, and data brokers, some of which may sell the information to us. To understand your rights and choices regarding Personal Information collected by other companies, please consult the privacy policies of the businesses that you interact with.

HOW WE SHARE PERSONAL INFORMATION

We may disclose your Personal Information for any purposes not inconsistent with this Privacy Policy, our written statements at the point of collection, or applicable law. In general, we share Personal Information as follows:

- Within our group of companies including with our affiliates, subsidiaries, locations, brands, etc.

- With our agents, vendors, consultants, and other service providers (collectively, “**Service Providers**”) in order for them to provide their services to us. For example, we may share your Personal Information to provide customer service, operate and improve our business and the Service, improve our products and customer service, help run our promotions (including coupons and rewards programs), process payments, perform auditing and quality control, communicate with you, and otherwise operate our business.
- With third parties for co-marketing purposes, to improve our products and services, or to provide you with other products and services that may interest you
- With our advertising partners for the purposes of ad targeting, remarketing, and customized advertising content
- As necessary, for the following purposes: (a) to comply with any legal process; (b) to respond to requests from public and government authorities; (c) to enforce our terms and conditions; (d) to protect our operations and protect our rights, privacy, safety, or property, and/or that of you or others; and (e) to allow us to pursue available remedies or limit the damages that we may sustain
- With our insurers and professional advisers for the purposes of managing risks, obtaining professional advice, exercising or defending against legal claims, etc.
- With third parties in connection with or during negotiations of any reorganization, acquisition, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding)

SOCIAL FEATURES ON OUR SERVICE

Certain functionalities on the Service permit interactions that you initiate between the Service and certain third-party services, such as social networks (“**Social Features**”). Examples of Social Features include: enabling you to send content such as contacts and photos between the Service and a third-party service; “liking” or “sharing” Blu’s content; logging in to the Service using your third-party service account (e.g., using Facebook Connect to sign-in to the Service); and to otherwise connect the Service to a third-party service (e.g., to pull or push information to or from the Service). If you use Social Features, information you post or provide access to may be publicly displayed on the Service or by the third-party service that you use. Similarly, if you post information on a third-party service that references the Service (e.g., by using a hashtag associated with Blu or one of our brands in a tweet or status update), your post may be used on or in connection with the Service or otherwise by Blu and/or our affiliates. Also, both Blu and the third party may have access to certain information about you and your use of the Service and any third-party service.

ANALYTICS

Our website uses analytics technology provided by our Service Providers to understand how users interact with the site, improve our web experience, and better market our products. Analytics services in use on our website include Google Analytics and Hotjar. These analytics services use cookies and other Tracking Technologies to collect information about how you use the Service. Personal Information collected by these analytics services (e.g., your IP address and other Usage Information) may be transmitted to and stored by these Service Providers on servers in the U.S. (or elsewhere). See below for more information on your choices regarding analytics services.

YOUR CHOICES ABOUT TRACKING AND COMMUNICATIONS FROM US

Cookies and Tracking Technologies

Our website offers a cookie preference center that allows you to exercise your choices on these technologies. Cookies may also generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options, so you may need to set them separately. Please review your browser's Help menu for instructions, or visit www.allaboutcookies.org for more information. Please note that if you disable all cookies, some features of our Service may not function properly.

Do Not Track Signals

Your browser settings may allow you to automatically transmit a "Do Not Track" signal to online services you visit. Note, however, there is no consensus among industry participants as to what "Do Not Track" means in this context. Like many online services, we currently do not alter our practices when we receive a "Do Not Track" signal from a visitor's browser. We do, however, respond to the Global Privacy Control ("GPC") signal for California residents wishing to opt-out of the "sale" of their Personal Information. For more information, please see our [California Privacy Notice](#).

Analytics and Advertising Technologies

You may exercise choices regarding the use of cookies from Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on.

To opt-out of Hotjar's collection and use of your Personal Information for analytics, please visit <https://www.hotjar.com/legal/policies/do-not-track/>.

You may choose not to receive some interest-based advertising by submitting opt-outs. Some of the advertisers and Service Providers that perform advertising-related services for us may participate in the Digital Advertising Alliance's ("DAA") Self-Regulatory Program for Online Behavioral Advertising and/or the Network Advertising Initiative ("NAI"). To learn more about how you can exercise certain choices regarding interest-based advertising, including use of cross-device data for serving ads, visit <http://www.aboutads.info/choices/>. To learn more about the NAI and your opt-out options for their members, see <http://www.networkadvertising.org/choices/>. Please be aware that opting out only means that those selected members should no longer deliver certain interest-based advertising to you but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks).

We also use advertising services provided by Google Ad Services. To learn more about the data Google collects for advertising and to opt out of certain ad targeting by Google, please visit [here](#).

In addition, we may serve ads on other online services that are targeted to reach people on those services who are also identified in one of more of our databases ("**Matched List Ads**"). This is done by using tracking technologies or by matching common factors between our databases and the databases of the other online services such as Facebook/Meta or Twitter. We are not responsible for these third-party services, including without limitation the security of the data they hold about you. If we use Facebook to serve Matched List Ads on Facebook services, you should be able to hover over the box in the right corner of such a Facebook ad, or go to your account settings, to find out what options Facebook offers you to control such ads. If we use Twitter Matched List Ads, you should be able to review your ad options in your account settings on Twitter.

Blu is not responsible for the effectiveness of any third parties' opt-out options or the accuracy of their statements regarding their programs

Email Communications

You may unsubscribe from our marketing email communications by clicking the “unsubscribe” link found in every commercial email we send, or by sending a request to unsubscribe to privacy@itgbrands.com. If you opt-out of our marketing email communications, we may still send you email messages related to your account or purchases with us. Unsubscribing from our marketing communications will not affect the level or quality of service we provide to you.

Text/SMS Messages

You have the choice to opt-in to receiving text messages and alerts on the mobile phone number(s) you share with us. Once you opt-in, we may send you text messages (i) regarding your account; (ii) about our products and promotions (including advertisements, sales, and special offers); (iii) to investigate or prevent fraud; and (iv) to alert you in the event of an issue with any of your purchases. You do not have to opt-in to text messages and alerts to use and enjoy our Service or products. If you opt-in, standard text messaging charges may apply. You may choose to opt-out from our text messages and alerts at any time. To directly opt-out, send us a text message from your mobile phone with the word STOP, STOP ALL, END, QUIT, CANCEL or UNSUBSCRIBE, and we will unsubscribe you from text communications. If you opt-out, you will not receive any additional text messages via your mobile phone. For more information regarding our text messaging and alerts, please contact us at privacy@itgbrands.com or 1 (888) 342-6567.

SECURITY AND PASSWORDS

We take commercially reasonable measures to protect Personal Information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. Nevertheless, transmission via the Internet and electronic storage are not completely secure, and Blu cannot guarantee the security of your Personal Information. You are responsible for maintaining the secrecy of any credentials used to access your account with us. If you suspect any unauthorized activity associated with your account, please report that activity to us immediately.

AGE RESTRICTIONS

The Service is intended for adults not less than twenty-one (21) years of age, and our website uses age-verification to exclude under-age individuals. If you are under twenty-one (21) years of age, you are not permitted to use the Service and should not send any Personal Information to us. Blu does not knowingly collect Personal Information as defined by the Children’s Online Privacy Protection Act (“COPPA”). If we learn that we collected Personal Information in a manner not permitted by COPPA, we will dispose of that information, or otherwise treat it, in accordance with COPPA and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under the age of thirteen (13) has provided us with Personal Information, please contact us [here](#).

NEVADA PRIVACY NOTICE

Nevada law allows residents to opt out of the sale of certain Personal Information, called “covered information.” At Blu, we do not sell covered information as defined under Nevada law and we have no plans to change that practice. If you want to be notified if we do change that practice, you may submit your request [here](#).

CALIFORNIA PRIVACY RIGHTS

California residents can learn more about their privacy rights [here](#).

INTERNATIONAL VISITORS

Our Service is directed solely to residents of the United States. If you access the Service from outside of the U.S., please be aware that Personal Information collected through the Service may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of the Service or provision of any Personal Information to us constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of your information in the U.S. as set forth in this Privacy Policy.

CHANGES TO THIS POLICY

By using our Service, you consent to the terms of this Privacy Policy and our [Terms of Use](#). We may change our Privacy Policy from time to time. Your use of our Service indicates your consent to the privacy policy posted at the time of use.

On January 1, 2022, we changed our Privacy Policy to clarify the types of personal information we collect about you, the ways we collect your information, and how we use and share your information. We updated our Privacy Policy to use the same standards across all of our brands and websites. We also updated the parts of our Privacy Policy that explain the rights of California and Nevada residents.

HOW TO CONTACT US

If you have any questions about this Privacy Policy, please contact us [here](#), by mail to 714 Green Valley Road, Greensboro, NC 27408-7018 (Attn: Legal Department), or by phone at 1 (888) 342-6567.