

Privacy Policy

This Privacy Policy applies to our website, <https://luxcreo.com/> or <https://luxcreo.cn/>, as well as products and services ("Services") provided by LuxCreo Inc. ("LuxCreo" together with "we," "us," and "our"). This statement governs our data collection, processing and usage practices.

This Private Policy is used to inform website visitors regarding our policies with the collection, use, and disclosure of Personal Information if anyone decided to use our Services.

If you choose to use our Services, then you agree to the collection and use of information in relation with this policy. The Personal Information that we collect are used for providing and improving the Services. We will not use or share your information with anyone except as described in this Privacy Policy.

The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, which is accessible at <https://luxcreo.com/> or <https://luxcreo.cn/>, unless otherwise defined in this Privacy Policy.

PLEASE READ AND UNDERSTAND THIS PRIVACY POLICY CAREFULLY BEFORE REGISTERING, LOGGING IN TO OUR WEBSITE, OR USING OUR PRODUCTS OR SERVICES. IF YOU CHOOSE TO REGISTER OR LOG IN TO OUR WEBSITE, OR USE OUR PRODUCTS OR SERVICES, IT MEANS THAT YOU FULLY UNDERSTAND THE ENTIRE CONTENT OF THIS PRIVACY POLICY AND AGREE TO OUR COLLECTION, USE, STORAGE AND SHARING OF YOUR INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY OR ANY PART OF IT, YOU MAY STOP USING OUR SERVICES IMMEDIATELY.

Information Collection

For a better experience while using our Services, we may require you to provide us your Personal Information and, we may collect Log Data.

Personal Information

"Personal Information" refers to any information that you voluntarily submit to us and that identifies you personally, including contact information, such as your name, e-mail address, company name, address, phone number, and other information about yourself or your business. Personal Information can also include information about any transactions, both free and paid, that you enter into on the LuxCreo website. Personal information may also include information collected and processed through our Services. Personal information may also include information we collect from users of partners of

our Services for the purpose of providing our own Services. Personal Information may further include your IP address or other Log Data discussed further below if applicable.

"Personal information" may also refer to biometric information that may include the scanned data of your body parts, which may include but not limit to foot, hand, face, teeth, oral cavity, torso. These scanned data may be used to provide certain Services in order to better provide functions and services such as parameter calculation and corresponding product recommendation. We may need to upload these scanned data into cloud service but we promise not to use these data for any purposes other than those identified in this Policy or provide to any third party unless it's necessary to perform Services. In order to improve user experience, we may use these data for big data analysis. We promise that we will de-identify these data before using them for any data analysis. If you refuse to authorize such use of your personal data, please notify us by contacting us at privacy@luxcreo.ai immediately. We will then stop using your personal data for big data analysis.

"Personal Information" also refers to any information we collect from third parties, such as third parties who market, sell, support or otherwise provide products or services relating to our Services, including publicly available databases such as LinkedIn.

In order to use certain Services, you may be required to create an account ("Account"), which will require you (or in some cases, may just give you the option) to provide Personal Information. We may also offer the option of creating an Account through connecting via a third party account (for example, with a social media site- a "Third Party Account"), in which case you will be required to approve the connection as well as the types of information (which may include Personal Information) that is made available to us from, and the types of activities that we may perform in connection with, that Third Party Account. Even if you later disconnect your Account from the Third Party Account, we still keep a copy of the Personal Information that we received from the connection of the two accounts.

In either case, we may send you an email, text message, or other electronic message confirming your Account creation (or otherwise instructing you how to confirm it).

Log Data

We want to inform you that whenever you visit our Services, we collect information that your browser sends to us that is called Log Data. This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser version, pages of our Service that you visit, the time and date of your visit, the time spent on those pages, and other statistics. Cookies are files with small amount of data that is commonly used an anonymous unique identifier. These are sent to your browser from the website that you visit and are stored on your computer's hard drive. Our website uses these "cookies" to collection information and to improve our Service. You have the option to either accept or

refuse these cookies, and know when a cookie is being sent to your computer. If you choose to refuse our cookies, you may not be able to use some portions of our Service.

Use of Information Collected

In addition to the uses identified elsewhere in this Privacy Policy, we may use your Personal Information to: (a) improve your browsing experience by personalizing our website; (b) send information (other than marketing communications) which we think may be of interest to you or that you have consented to receiving by post, email, or other means. This information includes notifications by phone or email of information about our products and services you may request; (c) send you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you; and (d) provide other companies with statistical information about our users – but this information will not include Personal Information of any kind or be used to identify any individual user. (e) send to third-party service providers that work with LuxCreo to provide for the provision of products pursuant to other agreements that we may have with you. (f) send to third-party printing partners if you request that we connect you to one of our third-party printing partners to assist with your printing project. In addition, we may share data with trusted partners to contact you based on your interest to receive such communications, help us perform statistical analysis, send you email or postal mail, or provide customer support. Such third parties are prohibited from using your Personal Information except for these purposes, and they are required to maintain the confidentiality of your information.

We use Log Data as necessary to operate and improve our website. We may also use Log Data alone or in combination with Personal Information to provide you with personalized information about LuxCreo such as whether shipping may be available in your region.

Retention of Data

LuxCreo acknowledges the importance of securely retaining and responsibly handling Personal Information. This section outlines our data retention practices, which comply with applicable privacy regulations and are designed to respect your privacy rights.

1. **Retention period:** We store your Personal Information for as long as necessary to fulfill the purposes for which it was collected, as outlined in this Privacy Policy, or to comply with any legal, contractual, or reporting obligations. Retention periods will depend on the type of data, its sensitivity, and the reasons for which it was collected.
2. **Data deletion:** Upon fulfilling the purposes for which your Personal Information was collected or when it is no longer required for legal or contractual reasons, we will delete or anonymize your data. If immediate deletion is not feasible due to technical or operational constraints, we will ensure your data is securely stored and isolated until complete deletion is possible.

3. **User-requested deletion:** You can submit a request to delete your Personal Information by contacting us at privacy@luxcreo.ai. We will process your request in accordance with the applicable privacy laws of your jurisdiction. Please note that we may need to retain certain information for legal or legitimate business purposes, even after receiving a deletion request.
4. **Data integrity:** We endeavor to maintain the accuracy and relevancy of the Personal Information we collect. If you believe your Personal Information is incorrect, incomplete, or outdated, you can contact us to request its modification or update.
5. **Termination of operations:** In the event that our website, products, or services cease to operate, we will notify you using methods such as push notifications or announcements. We will then proceed to delete or anonymize your Personal Information within a reasonable timeframe.

By using our products and services, you acknowledge and agree to our data retention practices as described in this Privacy Policy. If you have any questions or concerns about our data retention or deletion procedures, please feel free to reach out to us at privacy@luxcreo.ai.

Service Providers

We may employ third-party companies and individuals due to the following reasons:

- To facilitate our Services;
- To provide the Services on our behalf;
- To perform Services-related services; or
- To assist us in analyzing how our Services is used.

We want to inform our Services users that these third parties may have access to your Personal Information. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

International Transfer of Information

In the course of conducting our business operations, your personal information may be transferred to, stored in, and processed in countries other than your country of residence. These countries may have different data protection laws and regulations. However, we ensure an adequate level of protection of your personal information in accordance with applicable data protection laws and this Privacy Policy.

Cross-Border Transfers

We may need to share your personal information with our subsidiaries, affiliates or business partners located in various countries, including those outside of the European Economic Area ("EEA"), for the purposes specified in this Privacy Policy. We comply with the applicable legal requirements, such as the General Data Protection Regulation ("GDPR"), and take necessary measures to safeguard the cross-border transfer of your personal information.

Data Transfer Mechanisms

We use appropriate safeguards such as the EU-US Privacy Shield and the Swiss-US Privacy Shield frameworks, binding corporate rules, standard data protection clauses issued by the European Commission, or contractual agreements to ensure that your personal information is properly protected when transferred and processed outside of the EEA or your country of residence.

Third-Party Processing

When engaging with third-party service providers, we require them to abide by the same levels of data protection compliance as our own organization. These third parties are contractually obligated to process your information only to provide the services requested by us and to maintain an appropriate level of security and confidentiality when handling your personal information.

By using our services or providing your personal information to us, you agree to the transfer, storage, and processing of your information in the countries we operate in, including those outside of your country of residence. If you do not agree to these provisions, please refrain from using our services.

Security

We value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it. But remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

Links to Other Sites

Our Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Children's Privacy

Our Services do not address anyone under the age of 13. We do not knowingly collect personal identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

Data Subject Rights

If you reside within the European Economic Area ("EEA"), you have several rights under the General Data Protection Regulation ("GDPR") concerning your personal information. When exercising any of the rights listed below, please ensure you provide us sufficient information to identify and process your request. These rights include:

1. **The Right of Access:** You have the right to request and obtain a copy of your personal information that we hold, along with relevant details about how we process it.
2. **The Right to Rectification:** You have the right to request that we correct any inaccuracies or update incomplete personal information.
3. **The Right to Erasure ('Right to be Forgotten'):** You have the right, under certain circumstances, to request the deletion of your personal information. Please note some information may need to be retained for legal or operational reasons.
4. **The Right to Restrict Processing:** You have the right to request that we limit the processing of your personal information under specific circumstances or conditions.
5. **The Right to Data Portability:** You have the right to request that we provide you, or a third party you appoint, with a copy of your personal information in a structured, commonly used, and machine-readable format.
6. **The Right to Object:** You have the right to object to the processing of your personal information, for example, if it is for marketing purposes or if the processing is based on our legitimate interests.
7. **The Right to Lodge a Complaint:** You have the right to lodge a complaint with your local supervisory authority if you believe we are not complying with our data protection obligations.

To exercise these rights or if you have any questions regarding your personal information and our privacy practices, please contact us at privacy@luxcreo.ai and we will respond to your request promptly.

Opting-Out and Unsubscribing

We recognize and respect your right to control your personal information and communication preferences. You can manage your privacy and communication options as follows:

Marketing Communications

If you would like to stop receiving promotional emails or newsletters from us, you can opt-out by following the unsubscribe instructions provided in such communications or by contacting us directly. Please note that opting-out of receiving marketing communications does not prevent you from receiving important transactional or administrative messages, including messages related to your account, security updates, or service-related issues.

Cookies and Tracking Technologies

You may control the use of certain cookies and tracking technologies by adjusting the settings on your browser or device, or through available third-party tools. However, blocking certain cookies or tracking technologies may limit your access to certain features of our services. Please refer to our Cookie Policy for further details.

California Privacy Rights

California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure (if any) of Personal Information to third parties for their direct marketing purposes. To the extent applicable, you may make such a request by sending an email to privacy@luxcreo.ai. Please note that we are only required to respond to one request per customer each year.

If you are a California resident under the age of 18 and a registered user of certain parts of the Services, California Business and Professions Code Section 22581 permits you to remove content or Personal Information you have publicly posted. If you wish to remove such content or Personal Information, please contact privacy@luxcreo.ai, and provided you specify which content or Personal Information you wish to be removed, we will do so in accordance with applicable law. Please be aware that after removal you will not be able to restore removed content or Personal Information. In addition, such removal does not ensure complete or comprehensive removal of the content or Personal Information you have posted and that there may be circumstances in which the law does not require (or allow) us to enable removal.

Pursuant to the California Consumer Privacy Act of 2018 ("CCPA"), we are providing the following additional details regarding the Personal Information about California residents that we have collected or disclosed within the preceding 12 months:

Category	Collected
A. Identifiers	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	YES
C. Protected classification characteristics under California or federal law.	NO
D. Commercial information.	YES
E. Biometric information.	YES
F. Internet or other similar network activity.	NO
G. Geolocation data.	YES
H. Sensory data.	NO
I. Professional or employment-related information.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	NO
K. Inferences drawn from other personal information.	YES

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope.

The CCPA provides California residents with specific rights regarding their personal information. We are describing your CCPA rights and explaining how to exercise those rights in the following:

- You have the right to request LuxCreo disclose certain information to you about our collection and use of your Personal Information over the past 12 months.
- You have the right to request that LuxCreo delete any of your Personal Information that we collected from you and retained, subject to certain exceptions.
- You may only make a verifiable consumer request for access or data portability twice within a 12-month period.
- In some instances, we may decline to honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another California resident.
- Only you, or a person registered with the California Secretary of State that you authorize

to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

- We will not discriminate against you for exercising any of your CCPA rights.

Privacy Rights for Residents Outside of California

This Privacy Policy also applies to residents outside of California. While the specific rights mentioned in the California Privacy Rights section may not apply, we are committed to providing all users with transparent information about our data collection, usage, and privacy practices.

If you are a resident outside of California and you have any inquiries or concerns about how we process your Personal Information, or if you wish to request access, rectification, or erasure of your data, please contact us at privacy@luxcreo.ai. We will make every effort to address your request promptly and in accordance with the applicable data protection laws of your jurisdiction.

Note that, depending on the country or region you are located in, certain privacy rights and legal obligations may vary. We encourage you to familiarize yourself with the data protection laws and regulations of your jurisdiction, as these may grant you additional rights or impose specific requirements on how companies handle your Personal Information.

Please keep in mind that there may be circumstances where we will be unable to delete your Personal Information due to legal reasons or legitimate interests we may have in retaining certain data. In any case, we will respond to your request and provide clear explanations for our decision whenever applicable.

Remember that your communications with us, as well as the use of our products and services, signify your understanding and consent to the information practices detailed in this Privacy Policy.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. Thus, we advise you to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately, after they are posted on this page.

Contact Us

If you have any questions, comments or suggestions regarding this Privacy Policy, please contact us:

Privacy@luxcreo.ai

LuxCreo Inc.

350 W. Ontario Street Suite 700

Chicago, IL. 60654

Generally, we will reply within thirty days. If you are not satisfied with our response, especially if you believe that our processing of your information has harmed your legitimate rights and interests, you can also defend your legitimate rights and interests by filing a lawsuit in the court of our domicile.