

# TORRID PRIVACY POLICY

**Effective Date:** January 23, 2003

**Last Updated:** November 29, 2024

The Privacy Policy describes how Torrid Holdings, Inc. and our subsidiaries and affiliated entities (collectively, “Torrid” “we” and “us”) process personal information about you. This Privacy Policy applies when you engage with us online or offline, such as when you visit or use our websites or mobile applications (each a “Site” and collectively “Sites”), contact our customer service team, engage with us on social media, visit one of our retail stores, purchase our products, or otherwise interact with us.

This Policy does not apply to personal information processed in connection with applications to work for us or to personal information collected in the course of your employment. Our Workforce Privacy Notice applies to that personal information. Please contact Human Resources at [TDHumanResources@torrid.com](mailto:TDHumanResources@torrid.com) or click [here](#) to obtain a copy of our Workforce Privacy Notice.

You may download a copy of this Privacy Policy by clicking [here](#). If you have a disability and need to receive this Privacy Policy in a different format, please contact us at [privacy@torrid.com](mailto:privacy@torrid.com) or 866-867-7431.

**BY USING THE SITES, MAKING A PURCHASE WITH US, OR OTHERWISE PROVIDING US WITH YOUR PERSONAL INFORMATION, YOU ARE CONSENTING TO THIS PRIVACY POLICY. PLEASE READ IT CAREFULLY.**

## Contents

[Categories of Personal Information We Collect](#)

[Sources Of Personal Information](#)

[Purposes for Collecting Personal Information](#)

[How We Share Personal Information](#)

[We Combine Information](#)

[How Long We Keep Personal Information](#)

[Cookies, Analytics, and Other Tracking Technology](#)

[Links to Other Websites](#)

[Third-Party Payment Processors](#)

[The Torrid Credit Card](#)

[The Torrid Ambassador Program](#)

[Security](#)

[The Sites Are Not Intended for Children](#)

[Marketing Communications](#)

[Processing in the United States and Canada](#)

[California Privacy Rights](#)

[Nevada Privacy Rights](#)

[Additional State Privacy Rights](#)

[Canada Privacy Rights](#)

[Contact Us](#)

[Updates to Our Privacy Policy](#)

## Categories of Personal Information We Collect

We collect the following categories and types of personal information with your consent or as otherwise required or permitted by law:

- **Contact Information.** We collect full name, email address, shipping address, telephone number, and business contact information.
- **Identifiers.** We collect Internet protocol address, signature, username and password, and social media user names.
- **Personal Characteristics or Traits.** We collect date of birth, gender, age, nationality, racial or ethnic origin, religion, marital status, citizenship status, military or veteran status and disability information.

- **Financial Information.** We collect tax identification number, financial or bank account information, tax-related information, wire instructions, and billing address.
- **Commercial Information.** We collect records of products or services purchased, obtained, or considered.
- **Internet or Electronic Usage Data.** We collect data related to network and website interaction history, IP address, website cookie information, interaction with advertisements and browsing time.
- **Audio/Visual Data.** We collect audio, electronic, photographic, visual or similar data including videos, photographs, or audio recordings.
- **Geolocation Data.** We collect geolocation data including the general region or area from which you access our Sites.
- **Professional or Employment Information.** We collect your job title, office location, business contact details, and company entity when you contact us on behalf of a third-party.
- **Education Information.** We collect education history, degrees, certifications, and qualifications.
- **Sensitive Information.** We collect information regarding racial or ethnic origin, religious or philosophical belief, and sexual orientation.
- **Inferences:** We use information from the categories of personal information described above in order to create a profile about you, to reflect your preferences, characters, behavior and attitude.

## Sources Of Personal Information

We collect information in a variety of ways:

- **Directly from you.** We collect contact information, identifiers, personal characteristics or traits, financial information, commercial information, audio/visual data, professional or employment information, and inferences that you provide directly to us. This includes when you make an account with us, sign up for rewards, enter our sweepstakes or promotions, or if you otherwise provide that information directly to us.
- **When you visit our locations.** When you visit our offices or stores, we also collect contact information and audio/visual data.
- **When you visit our Sites.** When you access our Sites, we collect identifiers, commercial information, geolocation data, internet or electronic usage data, and inferences using tools like browser cookies.
- **From third parties:** We may collect contact information, identifiers, financial information, personal characteristics or traits, sensitive information, commercial information, education information, inferences, and professional or employment information from third parties including our vendors and service providers.
- **Social media platforms.** Depending on the information you choose to share and your privacy settings, we may collect contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information, and inferences. Based on the way you have set your privacy settings on your social media accounts, most social media platforms, like Facebook and Instagram, analyze data about how you interact with our Sites and combine it with information on other users to provide us information about you. In addition, we may receive information about you if other users interact with us on social media and information about you is visible to us, for example the fact that you are “friends” or other public-facing profile information.

## Purposes for Collecting Personal Information

We use your personal information for the following purposes:

- **Purchases.** We use contact information, identifiers, financial information, and commercial information to allow you to make a purchase, process your payment, provide you with a receipt or order confirmation, provide order updates, and deliver the products you have purchased.
- **Account and Torrid Rewards.** We use contact information, identifiers, financial information, and commercial information to allow you to create an account or sign up for our rewards program and to administer your account including processing and redeeming all points, cash, and discounts.
- **Transactional.** We use contact information, identifiers, financial information, professional or employment information, and commercial information to: (i) communicate with you; (ii) provide you with customer assistance; (v) administer contracts with our vendors and service providers and provide supporting business activities such as billing and collections, procurement, and tax related activities; and (vi) process your donations to Torrid Foundation and issue you a receipt for the donation.
- **Torrid Ambassador Program.** We use contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information, and inferences to administer the Torrid Brand Ambassador Program, including to verify sponsored posts, provide compensation, and confirm we are maintaining a diverse group of program ambassadors.
- **The Chat Feature.** We use all information provided to us during a chat session to provide you with customer service. If you use the Chat Feature on the Site to chat with a customer service representative, we will have access to a transcript of the chat session. This transcript may include contact information, identifiers, personal characteristics or traits, financial information, commercial information, audio/visual data, professional or employment information, education information, and sensitive information.
- **Torrid Credit Card.** If you are approved for a Torrid Credit Card, we will use contact information, identifiers, commercial information, financial information, and inferences to process and redeem your cardholder perks such as discounts, welcome offers, torrid cash, points, and rewards.
- **Analytical Purposes.** We use identifiers, internet or electronic usage data, geolocation data, commercial information, personal characteristics or traits, education information, sensitive information, and inferences to analyze preferences, trends and statistics.
- **Marketing and Promotional Purposes.** We use contact information, identifiers, personal characteristics or traits, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information, and inferences to improve our marketing efforts, conduct market research, administer sweepstakes and contests, administer promotions, and to provide you with information about us, including personalized marketing communications.
- **Maintenance and Improvement of our Sites and Systems.** We use identifiers, geolocation data, commercial information, audio/visual data, and internet or electronic usage data to improve our Sites and systems, provide and maintain functionality on our Sites and systems, and help us diagnose technical and service problems and administer our Sites and systems.
- **Develop and Improve Our Products and Services.** We use contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information, and inferences to help us develop new products and services and to improve and analyze our existing products and service offerings.
- **Security and Fraud Prevention.** We use contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information, and inferences to: (i) protect us, our employees, and our Sites, premises, assets, systems, products, services and intellectual property, including from fraud, theft, and misconduct; (ii) enforce our policies

and terms; (iii) conduct vendor due diligence; and (iv) detect and prevent fraud, theft and misconduct including by verifying the identity of those we are conducting business with.

- **Legal:** We use contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information, and inferences to comply with our legal obligations, including reporting requirements, and defend ourselves in legal proceedings, and protect our company and our property, employees, and others through legal proceedings.
- **Other Purposes:** We may use contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information, and inferences for other reasons we may describe to you.

## How We Share Personal Information

We share personal information in the following circumstances or as otherwise described in this Privacy Policy:

- **Service Providers, Contractors, and Agents.** We may share personal information with vendors and service providers who support the operation of our Sites, stores, and our business and who need access to such information to carry out their work for us (including, for example, cloud hosting, payment processing, order fulfillment, email delivery, marketing, insurance, operating systems and platforms, and customer support services). In some cases, such as payment processors, the vendor or service provider may directly collect the information from you on our behalf.
- **Affiliates.** We may share personal information with and among our parent company, subsidiaries, affiliates, or their successors or assigns.
- **Marketing/Analytics/Advertising Partners.** We may share personal information with third-party marketing, analytics or advertising partners, including social media platforms and networks, for commercial purposes such as sending you marketing emails.
- **Professional Advisors.** We may share information with professional advisors, such as lawyers, bankers, tax consultants, auditors, and insurers, where necessary in the course of the professional services that they render to us.
- **Government Entities.** We share information with regulatory and government entities including government, administrative, law enforcement and regulatory agencies; tax authorities; and other public agencies or authorities if we think we should in order to comply with any applicable law, regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us.
- **Corporate Transaction Recipients.** We may share information with potential investors, purchasers, merger partners, and their advisors in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations; or (iii) are soliciting or accepting investments.
- **With Your Consent or At Your Direction.** We may share information with third parties whenever you consent to or direct such sharing.
- **Other Reasons.** We may share information for other reasons we may describe to you.

## We Combine Information

We combine information we obtain from different sources including publicly available information. For example, we may combine information that we have collected offline with information we collect online. We combine information that we have collected across other third-party sites. We combine information across devices, such as computers and mobile devices. We may also combine information we get from a third party with information we already have.

## How Long We Keep Personal Information

We will retain and use your information for as long as we need it to provide you services or products, or as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Where we process personal information for marketing purposes, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing so that we can respect your request in future. We use the following criteria to determine retention periods:

- how long the information is needed to provide our services and operate our business;
- whether there are contractual or legal obligations that exist that require us to retain the information for period of time;
- whether you have created an account or enrolled in our rewards program;
- whether any law, statute, or regulation allows for a specific retention period;
- whether an individual has agreed to a longer retention period;
- whether the data is considered to be sensitive data, and
- what the expectation for retention was at the time the data was provided to us.

## Cookies, Analytics, and Other Tracking Technology

### Cookies and Tracking Technology

We want you to be aware that certain online tools exist to help us serve and recognize you when you visit our website. We receive and store certain types of information when you visit our website. When you access the website, we (including companies we work with) may place small data files on your computer or other device. These data files may be web beacons, cookies, clear gifs, pixel tags, e-tags, flash cookies, log files, or other local storage provided by your browser or associated applications. These tracking technologies, which are often referred to collectively as cookies, collect information about your use of the Sites and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in mobile apps, links clicked and conversion information. We use this information to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests, and better understand your online activity.

To change your preference regarding cookies, please visit the Torrid [website](#) and select the **DO NOT SELL OR SHARE MY PERSONAL INFORMATION** button located at the bottom of this web page.

### Do Not Track Signals

Some browsers have a “do not track” feature. It lets you tell websites you visit that you do not want them to track your online activity. These features are not yet uniform across browsers. Our Sites are thus not currently set up to respond to these signals. For more information on Do Not Track signals, please visit <https://allaboutdnt.com/>.

### Cross-Contextual Behavioral Advertising and Targeted Advertising

We allow third-parties to provide analytics and advertising services and serve advertisements on our behalf across the Internet and in mobile applications. Our advertising partners may collect information about your activities on our Sites on your current device and combine it with information about your activities on other websites, mobile apps, and devices. They may also collect IP address, browser or operating system type and version, and demographic or inferred-interest information, as well as personal information if you have submitted such information to us through the Sites, such as your name, postal address, email address, or device ID. They collect such information using server logs, cookies, web beacons, tags, pixels, mobile advertising IDs (such as Facebook cookies or Google's Advertising ID), cross-device linking, and similar technologies. For example, our advertising partners may use the fact that you visited our website to target advertising to you on other websites and mobile apps on your current device or on other devices you use. They may match your browsers or devices if you log into the same online service on multiple devices or if your devices share similar attributes that support an

inference that they are used by the same person or household. This means that information about your activity on websites or apps on your current browser or device may be combined and used with information collected from your other browsers or devices. These third parties partners use this information for our and their own advertising, analytics, attribution, and reporting purposes. To learn more about interest-based advertising, tracking technologies, and how to opt out, please visit <http://www.aboutads.info/choices>. You can disable the sharing of your personal information for cross-contextual behavioral advertising or targeted advertising through online cookies and tracking technology by visiting the Torrid [website](#) and selecting the **DO NOT SELL OR SHARE MY PERSONAL INFORMATION** button (located at the bottom of this web page) and changing your cookie preferences to ensure that Targeting cookies are disabled.

### Session Replay Technology

We use session replay technology on our Sites. Session replay technology, also referred to as session playback or user experience (UX) replay, collects information regarding, records, and tracks your interactions with a website or application. It then transforms those logged user events (such as mouse movements, clicks, page visits, scrolling, tapping, etc.) into a reproduction of what you actually did on the website or application. We use session replays for quality control, customer service, fraud prevention and security, and marketing purposes. Our session replay technology is owned and operated by a third-party who acts as our service provider. The information collected by this technology may be collected by, transferred to, and stored by our third-party service provider.

### ChatBot Technology

We use chatbots to help provide customer service and support, including through the use of a virtual assistant. A chatbot is a software application that mimics human conversations in text or voice interactions on our website or through our customer service hotline. It enables the communication between a human and a machine, which can take the form of messages or voice commands. The chatbot is designed to work without the assistance of a human operator. It responds to questions posed to it in natural language as if it were a real person using a combination of pre-programmed scripts and machine learning algorithms. When asked a question, the chatbot will answer using the knowledge database that is currently available to it. If the conversation introduces a concept it isn't programmed to understand; it will pass it to a human operator. If you use our chatbot service, we will collect any personal information you provide to use. We will also create and store a transcript of your chat interaction with us which will be shared with and stored by our third-party service provider. We use these transcripts and the information you provide for quality control, customer service, fraud prevention and security.

### Global Privacy Control and Opt-Out Preference Signals

Some browsers or browser extensions also allow you to tell websites not to share your information for cross-contextual behavioral advertising through the "global privacy control" or other opt-out preference signals. We will respond to these signals in a frictionless manner. Please note that we may not be readily able to associate an opt-out preference signal with other personal information such as your email address. If you configure this setting on your browser, certain features on our site may not work and you will receive less targeted advertising. You will also need to turn the setting on for each browser that you use.

### Google Analytics

We use analytics services provided by Google Analytics. If you would like more information on how Google uses data when you visit or use our Sites, please visit [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners). If you would like to opt-out, Google provides an opt-out tool which is available at <https://tools.google.com/dlpage/gaoptout>.

## **Links to Other Websites**

Our Sites may include links to other websites or applications whose privacy practices may differ from ours. If you submit personal information to any of those websites or applications, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit or application that you use.

## **Third-Party Payment Processors**

We use third-party payment processors to assist with processing your payment information. If you pay

with a credit card or other form of electronic payment, the payment information that you provide is transmitted directly to the payment processor who will process and store your personal information.

If you choose to use PayPal to make a purchase through the Site, you will be directed to the PayPal website and will provide your payment information directly to PayPal. PayPal's privacy statement, available at <https://www.paypal.com/webapps/mpp/ua/privacy-full>, applies to the information you provide to PayPal. PayPal will provide some personal information – such as your delivery address, email address, and telephone number – to us. We will process the personal information we receive from PayPal in accordance with this Privacy Policy.

If you choose to “Try Before You Buy” or split your payments using Klarna or the Klarna App, you will be required to provide your personal information directly to Klarna. Klarna's privacy policy, available at <https://www.klarna.com/us/privacy/>, applies to the information you provide to Klarna. Klarna will provide some personal information – such as your delivery address, email address, and telephone number – to us. We will process the personal information we receive from Klarna in accordance with this Privacy Policy.

## **The Torrid Credit Card**

Bread Financial offers customers the option to finance their purchases with a Torrid Credit Card. If you apply for or are approved for a Torrid Credit Card, Bread Financial will collect, use and store personal from you that the Bread Financial family of companies will use to process your application, finance purchases, administer your account and manage billing. Bread Financial's privacy policy, available at <https://www.breadfinancial.com/en/privacy.html>, applies to the information you provide to Bread Financial. We will process any personal information we receive from Bread Financial in accordance with this Privacy Policy.

## **The Torrid Ambassador Program**

If you join the Torrid Ambassador Program, you will be required to create a profile on AspireIQ, Inc.'s influencer marketing platform. We do not control and are not responsible for Aspire or its collection or use of your information. Aspire's privacy policy, available at [www.aspireiq.com/privacy](http://www.aspireiq.com/privacy), applies to the information you provide Aspire. Your participation in Torrid's Brand Ambassador Program is subject to the program's Terms of Service. If you have not done so already, please review the program terms of service located at <https://aspire.io/terms-of-service/>.

## **Security**

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented reasonable technical, organization, administrative and physical measures to protect personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security and encourage you to use websites and share information with caution.

If we become aware of a breach that affects the security of your personal information, we will provide you with notice as required by applicable law. To the extent permitted by applicable law, we will provide any such notice that we must provide to you under applicable law at your account's email address. By using the Services, you agree to accept notice electronically.

## **The Sites Are Not Intended for Children**

Our Sites are not directed to individuals under the age of 13. We do not knowingly collect or store any personal information from anyone under the age of 13. If we become aware that we have collected or stored personal information from an individual under age 13, we will use reasonable efforts to remove his or her personal information from our files. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to [privacy@torrid.com](mailto:privacy@torrid.com).

## **Your Choices**

**Marketing Emails and Newsletters.** You can opt out of marketing or advertising emails and newsletters by using the "unsubscribe" link or mechanism noted in communications you receive from us. You may also request to opt out of marketing or advertising emails by contacting us through one of the methods specified in the Contact Us section of this Privacy Policy. Once we process your request, we will cease

using the information for such purposes at no charge to you. If you opt out of getting marketing messages, you will continue to receive messages from us about your relationship with us where permitted by law.

**Phone Calls and Text Messages.** If you do not want to receive marketing phone calls or text messages from us, please inform us that you no longer want to receive calls from us when you receive a call from us, or reply STOP to a text message from us. You can also opt-out of telemarketing by contacting our customer service department.

**Your Torrid Account.** You can verify, correct, or update certain information associated with your account by logging into your profile. You are responsible for maintaining the accuracy of this information. You may deactivate your account by emailing Torrid Privacy at [privacy@torrid.com](mailto:privacy@torrid.com).

## Processing in the United States and Canada

Please be aware that information we obtain about you will be processed in the United States and across Canada by our service providers or us. By using the Sites or our services, you acknowledge your personal information may be transferred to and processed in jurisdictions outside your own as described in this Privacy Policy. Please be aware that the data protection laws and regulations that apply to your personal information transferred to the United States, Canada or other jurisdictions may be different from the laws in your country of residence. The United States may not afford the same level of protection as laws in your own country.

## California Privacy Rights

**Shine The Light.** If you are a California resident, this section applies to you. The California Shine the Light law (Cal. Civ. Code § 1798.83) permits residents of California to request certain details about how their information is shared with third parties for the third-parties' direct marketing purposes. If you are a California resident and would like to make such a request, please contact us at [privacy@torrid.com](mailto:privacy@torrid.com) and include "CA Shine the Light" in the subject line of your email.

## California Consumer Privacy Act ("CCPA").

**Categories, Sources, and Uses of Personal Information We Collect.** In the preceding 12 months, we have collected the following categories of personal information: contact information, identifiers, personal characteristics or traits, financial information, commercial information, internet or electronic usage data, audio/visual data, geolocation data, professional or employment information, education information, sensitive information, and inferences. For details about precise data points we collect, the categories of sources of such collection, and the business and commercial purposes for collecting personal information, please see the sections above titled Categories of Personal Information We Collect, Sources of Personal Information, and Purposes for Collecting Personal Information.

**Use or Disclosure of Sensitive Personal Information.** In the preceding 12 months, we have not used or disclosed sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA.

**Sale or Sharing of Personal Information.** In the preceding 12 months, we have "sold" or "shared" (as those terms are defined in the CCPA) the following categories of personal information: identifiers, commercial information, internet or electronic usage data, geolocation data, and inferences to marketing/analytics/advertising partners. We do not knowingly sell or share the personal information of minors under the age of 16.

**Disclosure for a Business Purpose.** In the preceding 12 months, we have disclosed the following categories of personal information to the following categories of third-party recipients:

Category of Personal Information	Categories of Recipients
Contact Information	<ul style="list-style-type: none"><li>• Service Providers</li><li>• Affiliates</li><li>• Marketing/Analytics/Advertising Partners</li><li>• Professional Advisors</li><li>• Operating Systems and Platforms</li></ul>



	<ul style="list-style-type: none"> <li>• Government Entities</li> </ul>
Identifiers	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Marketing/Analytics/Advertising Partners</li> <li>• Professional Advisors</li> <li>• Operating Systems and Platforms</li> <li>• Government Entities</li> </ul>
Financial information	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Operating Systems and Platforms</li> <li>• Government Entities</li> </ul>
Commercial Information	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Marketing/Analytics/Advertising Partners</li> <li>• Professional Advisors</li> <li>• Operating Systems and Platforms</li> </ul>
Personal Characteristics or Traits	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Marketing/Analytics/Advertising Partners</li> <li>• Professional Advisors</li> <li>• Operating Systems and Platforms</li> </ul>
Geolocation Data	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Marketing/Analytics/Advertising Partners</li> <li>• Operating Systems and Platforms</li> </ul>
Internet or Electronic Usage Data	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Marketing/Analytics/Advertising Partners</li> <li>• Operating Systems and Platforms</li> </ul>
Professional or Employment Information	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Professional Advisors</li> <li>• Operating Systems and Platforms</li> <li>• Government Entities</li> </ul>
Audio/Visual Data	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Operating Systems and Platforms</li> </ul>
Education Information	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Operating Systems and Platforms</li> </ul>
Sensitive Information	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Operating Systems and Platforms</li> </ul>
Inferences	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Affiliates</li> <li>• Operating Systems and Platforms</li> <li>• Marketing/Analytics/Advertising Partners</li> </ul>

For a more expansive description of the categories of recipients and business purposes for which we share personal information, please see the How We Share Personal Information section above.

**Your Rights Under the CCPA.** Subject to certain exceptions and limitations, the CCPA affords California consumers the following rights:

- You have the right to request that we tell you (i) the categories of personal information we have collected, sold, or shared about you, (ii) the sources of that information, (iii) the business or commercial purposes for collecting, selling or sharing the personal information; and (iv) the categories of third-parties to whom we have disclosed, sold or shared personal information.
- You have the right to request that we provide you with a copy of your personal information.
- You have the right to request that we delete personal information that we have collected from you.
- You have the right to opt-out of the sale of your personal information.
- You have the right to opt out of the sharing of your personal information for cross-context behavioral advertising.
- You have the right to direct us to limit the use or disclosure of your sensitive personal information to only the purposes specified in the CCPA.
- You have the right to correct inaccurate personal information that we hold about you.
- You have the right to not be discriminated against for exercising any of your CCPA rights. We will not discriminate against you, deny you services, charge you a different price, or provide you with a lesser quality of services if you exercise any of your CCPA rights.

**Exercising Your Rights.** To exercise any of your rights, please use our [webform](#) or call us toll free at 1-888-747-9429. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation.

In order to designate an authorized agent to act on your behalf, you must send a signed, written authorization to us at [privacy@torrid.com](mailto:privacy@torrid.com).

We engage in online advertising practices (and certain analytics or similar activities), which may be considered a “sale” or “share” for cross-context behavioral advertising. In addition to submitting the form above, you may need to disable sharing through cookies set by third parties on our Sites. To manage your cookie preferences, please visit the Torrid [website](#) and select the **DO NOT SELL OR SHARE MY PERSONAL INFORMATION** button located at the bottom of this web page and ensure that Targeting cookies are disabled.

If you have enabled Global Privacy Control or an opt-out preference signal on your browser or extension, we will honor such requests that can be recognized by our Sites by disabling Targeting cookies. Please note that we may not be readily able to associate an opt-out preference signal with other personal information such as your email address. You will also only be opted out of online sales or sharing of personal information, and will need to turn it on for each browser you use. Refer to the “Exercising Your Rights” above if you would like to extend your opt-out request beyond the online advertising practices described above.

**Notice of Financial Incentive.** Based on your commercial activity and other factors, we may offer you various financial incentives such as discounts, gift certificates, and other special offers when you provide us with personal information (such as your name, email address, phone number, postal address, and date of birth) to sign-up for the Torrid Rewards program. When you sign-up for Torrid Rewards, you opt-in to receive financial incentives. You can receive financial incentives (benefits) based on certain purchases. You may withdraw (opt-out) from receiving such financial incentives at any time by deactivating your Torrid Rewards account. The financial incentives offered in connection with Torrid Rewards are reasonably related to the value of a member’s data including the commercial activities of such member. We calculate the value of a member’s data based on various factors, including the member’s commercial activities and the expenses related to the offer, provision, or imposition of the financial incentives (benefits) to such member.

**Other Consumer Rights Information.** Under California Civil Code Section 1789.3, we are required to

provide California residents with the following information:

- Unless otherwise expressly stated, this Site is provided without charge.
- To file a complaint regarding this Site or to receive further information regarding use of this website, please contact us via email at [privacy@torrid.com](mailto:privacy@torrid.com). You also may contact the Complaint Assistance Unit of the Division of Consumer Services of California's Department of Consumer Affairs in writing at 400 R Street, Suite 1080, Sacramento, California 95814 or by telephone at (916) 445-1254 or (800) 952-5210.

**Removal of Content.** If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to [privacy@torrid.com](mailto:privacy@torrid.com). Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

## Nevada Privacy Rights

If you are a Nevada resident, you may request that we stop selling certain categories of personal information that we collect. To submit a request please use our [webform](#) or call us toll free at 1-888-747-9429. For all requests, you must provide us with your name, email address, phone number, and mailing address so that we can verify your identity by matching the information we have collected against the information you have provided. Failure to provide all of the foregoing information may prevent us from processing your request.

## Additional State Privacy Rights

This section applies to you if you are a resident of Virginia, Colorado, Connecticut, Texas, Oregon, Utah, Montana, Iowa, Delaware, New Hampshire, New Jersey, or Nebraska.

We set forth above the categories of personal data we process, the purpose for processing personal data, the categories of personal data shared, and the categories of third parties with whom personal data is shared.

**Your Rights.** Subject to certain exceptions and limitations, consumers have the following rights:

- You have the right to request that we confirm whether or not we are processing your personal data and to access your personal data.
- You have the right to obtain a copy of your personal data in a portable and, to the extent technically feasible, readily usable format that allows data portability.
- You have the right to correct inaccurate personal data that we hold about you, taking into account the nature of the personal data and the purposes of the processing of the data.
- You have the right to request that we delete personal information that we have collected from you or obtained about you.
- You have the right to opt out of the processing of the personal data for purposes of (i) targeted advertising, (ii) the sale of personal data, or (iii) automated decision-making or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

**Exercising Your Rights.** To exercise any of your rights, please use our [webform](#) or call us toll free at 1-888-747-9429. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation.

In order to designate an authorized agent to act on your behalf, you must send a signed, written authorization to us at [privacy@torrid.com](mailto:privacy@torrid.com).

**Appealing Our Decision.** If we refuse to take action on your request, you may appeal our decision within a reasonable period of time, not to exceed 90 calendar days from the date of your receipt of our response. You may exercise your appeal rights by emailing us at [privacy@torrid.com](mailto:privacy@torrid.com). Please include your full name, the basis for your appeal, and any additional information to consider.

### **Cookie Based Opt-Outs for Cross Context Behavioral Advertising**

We engage in online advertising practices (and certain analytics or similar activities), for targeted advertising and cross-context behavioral advertising. To turn off targeted and behavioral advertising through cookies, please visit the Torrid [website](#) and select the **DO NOT SELL OR SHARE MY PERSONAL INFORMATION** button located at the bottom of this web page and ensure that Targeting cookies are disabled. Please note that we may not be readily able to associate your personal information with your IP address or Device ID.

If you have enabled an opt-out preference signal on your browser or extension, we will honor such requests that can be recognized by our Sites by disabling Analytics and Advertising cookies. Please note that we may not be readily able to associate an opt-out preference signal with other personal information such as your email address. You will also only be opted out of online targeted advertising or cross-context behavioral advertising and will need to turn it on for each browser you use. Refer to the "Exercising Your Rights" above if you would like to extend your opt-out request beyond the online advertising practices described above.

## **Canada Privacy Rights**

**Your Rights.** If you are a resident of Canada, subject to certain exceptions and limitations, you have the following rights:

- Your right of access: Upon your written request, subject to certain exceptions, we will inform you of the existence, use, and disclosure of your personal information and will provide you with a copy of that personal information within the timeframes provided for by law. Access requests should be sent to us using the contact information below. We try to respond to all legitimate requests within one month. Occasionally, if required or permitted by law, it could take us longer than one month if your request is particularly complex or you have made a number of requests. In these cases, we will notify you and keep you updated. Depending on the scope of your request, or if you require additional copies, we may need to charge you a reasonable fee where permitted under law.
- Your right to rectification: If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we will let them know about the rectification where possible and where this would not involve disproportionate effort. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.
- Your right to be forgotten: If you are a resident of the province of Quebec, you have the right to control the dissemination of your personal information. As such, you may request that we de-index (i.e. delist from search results) any hyperlinks associated with your name and that provide access to your personal information if the underlying dissemination of your personal information contravenes the law or a court order, or if it otherwise causes serious injury to your reputation or privacy. This also includes your right to re-index (i.e. list in search results) any hyperlinks associated with your name where doing so can prevent the perpetuation of a serious injury to your reputation or privacy. You can contact us for assistance in deleting personal information previously provided to us. Please note that we will take a reasonable amount of time to process your request.

- Your right to personal information portability: If you are a resident of the province of Quebec, you have the right, in certain circumstances, to obtain the personal information that you have provided us with (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.
- Your rights in relation to automated decision-making and profiling: If you are a resident of the province of Quebec, you have the right to know if we use your personal information to render a decision based exclusively on automated processing of such information. Upon request, you also have the right to know the categories of personal information used to render the decision, the reasons, and the principal factors that led to that decision. You have the right to correct the information used to render the decision, if you notice any inaccuracy. Lastly, you can submit observations in support to a request to review any automated decision reached using your personal information.
- Your right to request information about data processing: You may contact us to request information about our data processing activities, namely what personal information was collected from you and how process it. You may ask us to clarify the categories of persons that have access to your personal information and the applicable retention period for that information.
- Your right to withdraw consent, deactivate your account, or unsubscribe: You have the right to withdraw your consent to our collection, use, and disclosure of personal information at any time. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

**Exercising Your Rights.** To exercise any of your rights, please use our [webform](#) or call us toll free at 1-888-747-9429. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation.

## Contact Us

If you have any questions about this Policy or our data practices, please contact us at [privacy@torrid.com](mailto:privacy@torrid.com) or 1-866-867-7431.

## Updates to Our Privacy Policy

From time to time, we may change our privacy policy. We will notify you of any material changes to our privacy policy as required by law. We will also post an updated copy on the website where this appears. Please check our website periodically for updates. The "Last Updated" legend above indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on any of our Sites.