

PRIVACY POLICY

Last Updated: April 9, 2025

1. INTRODUCTION

1.1 Overview

This Privacy Policy (“Policy”) describes how Swatched Beauty Inc. (“Swatched,” “we,” “us,” or “our”) collects, uses, shares, and protects personal information obtained from users (“you” or “your”) of our website www.swatched.com and any related services (collectively, the “Services”).

1.2 Acceptance of Terms

By accessing or using our Services, you agree to be bound by these terms. If you do not agree to these Terms, do not use the Services. Some features may use automated systems or AI to provide personalized suggestions. See Sections 4.2 and 4.3 for details. By using the Services, you acknowledge and consent to the collection and use of your Personal Information, including Sensitive Personal Information and Consumer Health Data, as described in Section 5 below and in our Privacy Policy.

1.3 Changes to This Privacy Policy

We reserve the right to modify this Privacy Policy at any time. We will notify you of any material changes by sending an email to the email address associated with your account and/or by posting a notice on our website at least thirty (30) days prior to the implementation of such changes. Your continued use of the Services after such notification constitutes your acceptance of the modified Privacy Policy.

2. DEFINITIONS

For purposes of this Privacy Policy, the following definitions apply. These terms are specific to the collection, use, and protection of personal information as described in this document. They do not replace or modify the

definitions set forth in Swatched's [Terms and Conditions](#), which govern use of the Website and purchase of products.

2.1 “Swatched” means Swatched Beauty Inc., including its subsidiaries and affiliates.

2.2 “User” or “You” refers to any individual accessing or using the Services provided by Swatched.

2.3 “Services” means the Swatched platform, website, mobile application, tools, content, recommendations, checkout system, and all features made available through www.swatched.com and affiliated digital experiences.

2.4 “Personal Information” means any information that identifies, relates to, or could reasonably be linked, directly or indirectly, with a particular individual or household.

2.5 “Sensitive Personal Information” includes, but is not limited to, biometric data, facial features, racial or ethnic background, health-related data, and any information protected under applicable law as “sensitive.”

2.6 “Biometric Information” means data derived from a user's facial features, image, or video that may be used to identify or infer physical characteristics for cosmetic personalization. Swatched does not use biometric data for identity verification or recognition purposes.

2.7 “Consumer Health Data” means any personal information that relates to past, present, or future physical or mental health status, as defined by applicable law e.g. [California Consumer Privacy Rights Act \(CPRA\)](#), [My Health My Data Act \(MHMDA\)](#), [Connecticut Data Privacy Act \(CTDPA\)](#), [Virginia Consumer Data Protection Act \(VCDPA\)](#), [California Civil Code §1798.83 \(Shine the Light\)](#).

2.8 “Third-Party Retailer” refers to any brand or merchant whose products are sold through the Swatched platform but fulfilled by the retailer itself.

2.9 “Merchant of Record” means that Swatched processes the transaction and collects payment on behalf of third-party retailers, even if it does not ship or manufacture the products.

3. INFORMATION WE COLLECT

3.1 Categories of Personal Information

We collect the following categories of personal information:

3.1.1 Contact Information

- a) Full name
- b) Email address
- c) Postal address
- d) Phone number
- e) Account username and password

3.1.2 Demographic Information

- a) Age and date of birth
- b) Gender
- c) Location data
- d) Preferences and interests

3.1.3 Usage Data

- a) IP address
- b) Browser type and version
- c) Operating system
- d) Device information
- e) Referring website
- f) Pages visited
- g) Time and date of visits
- h) Click patterns
- i) Features used
- j) Search queries

3.1.4 Transaction Information

- a) Purchase history

- b) Payment information (processed through secure third-party payment processors)
- c) Shipping information
- d) Billing details

3.1.5 User-Generated Content

- a) Reviews
- b) Comments
- c) Feedback
- d) Survey responses
- e) Customer service interactions

3.1.6 Biometric Information

Biometric data, such as facial features or skin tone analysis, may be collected to support cosmetic personalization features. For more detail, please refer to Section 5 of this Policy.

3.2 Methods of Collection

We collect personal information through:

3.2.1 Direct Interactions

- a) Account registration
- b) Purchase transactions
- c) Customer service communications
- d) Surveys and feedback forms
- e) Contest or promotion participation

3.2.2 Automated Technologies

- a) Cookies and similar tracking technologies
- b) Web beacons
- c) Server logs
- d) Analytics tools

3.2.3 Third-Party Sources

We may also collect personal or commercial information from third-party sources, including:

- a) Social media platforms (when you connect your account)
- b) Business partners that support communications, analytics, or operational functions
- c) Public databases and market research tools
- d) Authorized onboarding and integration partners, who provide brand and product-level data such as SKUs, descriptions, shades, claims, or imagery for their participation on the Swatched platform

4. HOW WE USE YOUR INFORMATION

4.1 Primary Purposes

We use your personal information for the following purposes:

4.1.1 Service Provision and Improvement

- a) Processing transactions and fulfilling orders
- b) Creating and maintaining your account
- c) Providing customer support
- d) Improving and personalizing our Services
- e) Developing new products and features
- f) Analyzing usage patterns and trends

4.1.2 Communication

- a) Responding to your inquiries
- b) Providing important notices and update
- c) Sending transactional information
- d) Delivering promotional materials, special offers, and advertisements (subject to your preferences)

4.1.3 Analytics and Research

- a) Conducting market research
- b) Analyzing user behavior and preferences
- c) Measuring the effectiveness of our Services
- d) Generating aggregated, non-identifying statistics

4.2 Automated Decision-Making and Profiling

We engage in automated decision-making and profiling activities using your personal information for:

4.2.1 Product Recommendations

We analyze your browsing history, purchase patterns, and stated preferences to recommend products that may interest you.

4.2.2 Product Use Instructions

Based on your profile information (such as skin type, hair type, or beauty concerns), we automatically generate personalized instructions for product usage.

4.2.3 Price Filtering Based on Preferences

Swatched may allow users to filter or prioritize products based on self-reported price preferences or ranges. These settings are manually selected by you and are not determined by automated profiling or prediction of your purchasing behavior.

Swatched does not use sensitive personal information, biometric data, or protected class indicators (such as race, ethnicity, or gender) to adjust pricing.

If we introduce automated pricing systems in the future that may significantly affect your rights or access, we will provide advance notice and allow you to exercise your rights under applicable law.

4.3 AI Personalization Disclaimer

Our AI-based systems are designed to provide cosmetic product recommendations and usage instructions based on your data and preferences. These systems do not provide medical advice, dermatological diagnoses, or guaranteed results. While we strive for accuracy, Swatched does not guarantee that recommended products will match your skin tone, texture, sensitivity, or preferences. We are not liable for allergic reactions, product incompatibility, or any dissatisfaction resulting from automated suggestions.

We do not train our AI systems using identifiable personal data.

Some personalization features may use third-party AI technologies to assist with recommendations. These vendors are contractually required to:

- a) Not use your identifiable personal data to train their models
- b) Adhere to strict confidentiality and data security obligations
- c) Implement safeguards consistent with U.S. data privacy laws
- d) Limit their use of data to the purposes specified in our agreements
- e) Where possible, Swatched shares only de-identified or pseudonymized data with these third-party systems.

These third-party providers act solely as data processors on behalf of Swatched and do not make independent decisions about your personal information. They are contractually bound to process data only under our instructions and are located in the United States or Canada. A list of current data processors is available upon request by contacting legal@swatched.com.

4.4 Face Map Use in Application Instructions

If you opt-in to facial scan features, Swatched may generate simplified, non-lifelike diagrams or “face maps” based on your facial structure (e.g., face shape, eye shape, lip shape). These visuals are solely for educational cosmetic application purposes. They are not diagnostic tools and do not reflect any medical interpretation of your features.

If you choose to save your face maps, they will be stored securely in your account and used to support future personalized application guidance. These visuals are not shared with any third parties, are not used for training AI models, and are only retained while your account is active or until you choose to delete them through your account settings.

4.5 Legal Bases for Processing (Where Required by Law)

Depending on your jurisdiction, we may be required to disclose the legal bases for processing your personal information. These bases may include:

- a) **Consent:** Where required, we will ask for your express permission before collecting or processing certain data (e.g., biometric or health-related data).
- b) **Contractual Necessity:** We process data to perform a contract with you, such as fulfilling orders or providing customer support.
- c) **Legitimate Interests:** We may process data for purposes such as improving services, fraud prevention, and maintaining security, provided those interests are not overridden by your privacy rights.

- d) **Legal Obligations:** We may process data where necessary to comply with laws or respond to lawful requests from regulators, courts, or law enforcement.

5. SENSITIVE PERSONAL INFORMATION AND CONSUMER HEALTH DATA

Swatched may collect and process certain types of Sensitive Personal Information and Consumer Health Data when voluntarily provided by users to personalize their experience with the Services. This information may include, but is not limited to:

- a) Facial features, skin tone, skin type, and other biometric-derived characteristics used for cosmetic matching or virtual try-on;
- b) Health-related attributes, such as skincare concerns, allergies, sensitivities, or reactions;
- c) Demographic indicators that may reveal racial or ethnic background.

Such information is used solely to provide product recommendations, improve service relevance, and support user customization. Swatched does not use this information to infer unrelated characteristics, does not disclose it for advertising purposes without explicit consent, and does not sell this information.

Collection and use of sensitive information will be conducted in accordance with applicable U.S. privacy laws, including the [California Consumer Privacy Rights Act \(CPR\)](#), [Washington's My Health My Data Act \(MHMDA\)](#), the [Connecticut Data Privacy Act \(CTDPA\)](#), the [Virginia Consumer Data Protection Act \(VCDPA\)](#), and [Nevada SB370](#).

By using the Services, you acknowledge that certain recommendations may rely on sensitive or health-related inputs you provide, and you agree to the use of such data as outlined herein. You may revoke consent or request deletion of sensitive data at any time by contacting us at legal@swatched.com or adjusting your account settings. Where third-party vendors process sensitive or consumer health data on our behalf, they are contractually bound to maintain equivalent or greater levels of protection, confidentiality, and lawful use.

Important Privacy Notice Regarding Sensitive Data

Please be aware that sharing sensitive personal data—such as skin conditions, health concerns, biometric information, or facial features—carries inherent privacy risks. While Swatched uses commercially reasonable measures to protect your data, including encryption and access controls, no system can guarantee absolute security.

We encourage you to carefully consider the information you choose to share and to periodically review your privacy preferences in your account settings. Swatched is not responsible for any adverse outcomes related to your voluntary sharing of sensitive information beyond the scope of the Services described in this Policy.

6. COOKIES AND TRACKING TECHNOLOGIES

6.1 Types of Cookies We Use

6.1.1 Essential Cookies

These cookies are necessary for the website to function properly and cannot be switched off in our systems. They are usually set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in, or filling in forms. Essential cookies include:

- a) Session cookies for website functionality
- b) Security cookies for fraud prevention
- c) Load balancing cookies for website performance

6.1.2 Performance and Analytics Cookies (Opt-in)

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site.

6.1.3 Functionality Cookies (Opt-in)

These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third-party providers whose services we have added to our pages.

6.1.4 Targeting and Advertising Cookies (Opt-in)

These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant advertisements on other sites.

6.2 Cookie Management

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Services may become inaccessible or not function properly.

When you first visit our website, you will be presented with a cookie consent banner allowing you to opt in to non-essential cookies. You can change your cookie preferences at any time by visiting the [Cookie Settings](#) link in the footer of our website.

7. INFORMATION SHARING AND DISCLOSURE

7.1 Third-Party Disclosures

We may share your personal information with the following categories of third parties:

7.1.1 Service Providers

We share information with vendors, consultants, and other service providers who need access to such information to carry out work on our behalf, including:

- a) Payment processors
- b) Shipping and fulfillment services
- c) Customer service providers
- d) Email and communication services
- e) Cloud storage providers
- f) Analytics providers
- g) IT and security services
- h) Onboarding and inventory management platforms (e.g., for syncing product data or vendor registration)

Where users purchase a product through the Swatched platform, we may share relevant personal information (such as your name, shipping address, email address,

and phone number) with the third-party brand or fulfillment partner **solely** for the purpose of processing and fulfilling your order. These partners are **contractually obligated** to safeguard this information, use it only for order-related purposes, and comply with applicable privacy laws, including those governing sensitive data.

For brand partners, onboarding platforms, and service vendors acting as data processors on behalf of Swatched, our standard Data Processing Agreement (DPA) is available upon request. To initiate a DPA review, please contact us at legal@swatched.com.

7.1.2 Marketing Partners and Advertisers

With your consent or where permitted by law, we may share your information with:

- a) Marketing and advertising networks
- b) Social media platforms
- c) Promotional partners
- d) Influencer networks

7.1.3 Business Transfers

If Swatched Beauty Inc. is involved in a merger, acquisition, financing, reorganization, bankruptcy, or sale of company assets, your information may be transferred as part of that transaction.

7.1.4 Legal Requirements

We may disclose your information if required to do so by law or in response to valid requests by public authorities (e.g., a court or government agency).

7.2 No Sale of Personal Information

We do not sell your personal information in the conventional sense for monetary value. However, under certain state privacy laws—such as the [California Consumer Privacy Rights Act \(CPRA\)](#), [Colorado Privacy Act \(CPA\)](#), and [Virginia Consumer Data Protection Act \(VCDPA\)](#)—some sharing of personal information for analytics, advertising, or cross-context behavioral targeting may be deemed a “sale” or “sharing” even if no money changes hands. Swatched may allow third-party analytics or advertising providers to collect information via cookies or

other tracking technologies to support user experience, personalization, and performance measurement. You have the right to opt out of this type of data use as described in Section 10.2.4. We honor Global Privacy Control signals and provide opt-out tools to exercise these rights.

8. DATA RETENTION

8.1 Retention Period

We retain your personal information for as long as your account is active, plus one (1) year following account closure or inactivity. After this period, we will securely delete or anonymize your personal information, unless:

- a) We are required to retain it to comply with applicable laws or regulations
- b) We need to retain it for our legitimate business purposes, such as fraud prevention or business analytics
- c) We need to retain it to resolve disputes or enforce our agreements

8.2 Retention of Specific Data Types

Different types of data may be retained for different periods:

- a) Account information: For the duration of your active account plus one year
- b) Transaction data: Seven years for tax and accounting purposes
- c) Communications: Two years from the date of communication
- d) Marketing preferences: Until you opt out or request deletion
- e) Device and usage data: 13 months from collection

8.3 Anonymized and Aggregated Data Use

We may anonymize or aggregate your personal information for internal research, platform optimization, and trend forecasting. This data no longer identifies you individually and may be used to improve our recommendation engine and inform product development insights across the beauty industry. This aggregated and anonymized data may also be used to train or refine our AI-powered personalization systems. We do not use identifiable personal information, biometric data, or health data to train these systems.

9. DATA SECURITY

9.1 Security Measures

We implement and maintain reasonable security measures to protect your personal information from unauthorized access, disclosure, alteration, and destruction.

These measures include:

- a) Encryption of sensitive personal information both in transit and at rest using industry-standard encryption protocols
- b) Secure server infrastructure with appropriate firewalls and intrusion detection systems
- c) Regular security assessments and penetration testing
- d) Access controls limiting employee and contractor access to personal information
- e) Employee training on data security and privacy practices
- f) Physical security measures at our facilities

9.2 Data Breach Notification

In the event of a data breach that compromises your personal information, we will notify you and the appropriate regulatory authorities without unreasonable delay, and in any case within the timeframes required by applicable law.

Where applicable law specifies a particular notice period (such as 72 hours under certain international frameworks), we will make reasonable efforts to meet those standards.

Our notification will include, to the extent required and available:

- a) A description of the nature of the breach
- b) The categories and approximate number of individuals affected
- c) The categories of information involved
- d) Contact information for questions
- e) Steps we are taking to investigate, mitigate, and prevent future breaches
- f) Recommendations for steps you can take to protect yourself

9.3 Third-Party Security

While we implement safeguards designed to protect your information, no security system is impenetrable. We cannot guarantee the security of information

transmitted to us over the internet, and we are not responsible for the actions of third parties who may receive any information you disclose to them.

10. YOUR PRIVACY RIGHTS AND CHOICES

10.1 Access and Control

You have the following rights regarding your personal information:

10.1.1 Account Information

You can access, update, or delete your account information at any time by logging into your account settings on our website.

10.1.2 Communication Preferences

You can opt-out of receiving promotional communications from us by following the unsubscribe instructions included in each communication or by adjusting your notification preferences in your account settings.

10.1.3 Cookies and Tracking

You can manage your cookie preferences through our Cookie Settings tool or your browser settings as described in Section 4.

10.1.4 Additional Rights in Certain Jurisdictions

Depending on your state of residence, you may also have the following rights under applicable U.S. privacy laws such as the [Connecticut Data Privacy Act \(CTDPA\)](#), [Colorado Privacy Act \(CPA\)](#), and [Virginia Consumer Data Protection Act \(VCDPA\)](#):

- a) **Data Portability:** The right to request a copy of your personal information in a structured, commonly used, and machine-readable format.
- b) **Right to Object to Profiling:** The right to opt out of profiling in furtherance of decisions that produce legal or similarly significant effects, including targeted advertising or automated decision-making.
- c) **Limit Use of Sensitive Personal Data:** The right to limit how we use your sensitive data beyond what is reasonably necessary to deliver our Services.

To exercise these rights, you may email us at legal@swatched.com or submit a request through our privacy rights form at www.swatched.com/privacy-request.

10.2 California Privacy Rights

If you are a California resident, you have the following additional rights under the [California Consumer Privacy Act \(CCPA\)](#) and [California Privacy Rights Act \(CPRA\)](#):

10.2.1 Right to Know

You have the right to request information about the personal information we have collected about you, including:

- a) Categories of personal information collected
- b) Categories of sources from which personal information is collected
- c) Business or commercial purpose for collecting, selling, or sharing personal information
- d) Categories of third parties with whom we share personal information
- e) Specific pieces of personal information we have collected about you

10.2.2 Right to Delete

You have the right to request deletion of personal information we have collected from you, subject to certain exceptions.

10.2.3 Right to Correct

You have the right to request correction of inaccurate personal information that we maintain about you.

10.2.4 Right to Opt-Out of Sale or Sharing

You have the right to opt-out of the sale or sharing of your personal information for cross-context behavioral advertising purposes.

You may also opt-out of automated decision-making or profiling where it produces legal or similarly significant effects, as required by applicable law. To do so, contact us at legal@swatched.com.

We honor Global Privacy Control (GPC) signals in accordance with applicable privacy laws. If your browser or extension sends a GPC signal, Swatched will treat it as a legally valid request to opt out of the sale or sharing of your personal information for cross-context behavioral advertising.

We log and honor these signals at the browser or device level, and apply the opt-out preference to future sessions unless revoked.

10.2.5 Right to Limit Use of Sensitive Personal Information

You have the right to limit our use and disclosure of sensitive personal information to purposes necessary to provide our services.

10.2.6 Right to Non-Discrimination

We will not discriminate against you for exercising any of your [CCPA/CPRA](#) rights.

To exercise your California privacy rights, please submit a verifiable consumer request by:

- a) Emailing us at legal@swatched.com
- b) Visiting www.swatched.com/privacy-request

Please note: Swatched currently processes privacy requests through email and webform. If a telephone intake method becomes legally required or operationally appropriate, we will update this section accordingly.

10.3 Shine the Light

[California's "Shine the Light" law \(Civil Code Section 1798.83\)](#) permits users who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to legal@swatched.com.

10.4 Data Deletion Requests

Upon your request to delete your personal information, we will:

- Permanently delete your personal information from our active systems within 30 days

- De-identify or aggregate any information that we are required to retain for legal, security, or business purposes
- Ensure that your information is deleted from the systems of our service providers
- Provide you with confirmation once the deletion is complete

To request deletion of your data, please contact us at legal@swatched.com or through your account settings.

10.5 Appeals of Denied Requests

If we deny a request to exercise your privacy rights under applicable state law, you may appeal our decision by emailing legal@swatched.com with the subject line “Appeal Request” and including a brief explanation of your concern. We will review and respond to your appeal within 45 days, as required by law.

11. CHILDREN’S PRIVACY

11.1 Age Restrictions

Our Services are not directed to children under 16 years of age, and we do not knowingly collect personal information from anyone under the age of 13. Users under the age of 16 are not permitted to use the Services. We require users to provide their date of birth during the registration process to verify eligibility. If we learn that we have collected personal information from a child under the age of 13, we will delete such information promptly and in accordance with the [Children’s Online Privacy Protection Act \(COPPA\)](#) and other applicable laws.

11.2 COPPA Compliance

We comply with the [Children’s Online Privacy Protection Act \(COPPA\)](#). For more information about [COPPA](#) and general tips about protecting children’s online privacy, please visit the [Federal Trade Commission](#) website.

12. BIOMETRIC AND HEALTH DATA

12.1 Biometric Information Collection and Use

If you choose to use features that involve biometric information (such as facial recognition for virtual try-on or skin tone analysis):

- a) We will obtain your explicit consent before collecting any biometric information.
- b) We will clearly disclose the purpose and duration of our use of such information.
- c) We will not sell, lease, trade, or otherwise profit from your biometric information.
- d) We will permanently destroy biometric information when the initial purpose for collecting it has been satisfied, or within one (1) year of your last interaction with us—whichever occurs first.
- e) We maintain a written biometric data retention and destruction policy consistent with the [Illinois Biometric Information Privacy Act \(BIPA\)](#), the [Texas Capture or Use of Biometric Identifier Act](#), and similar applicable laws. Biometric information is securely deleted in a manner designed to prevent reconstruction or re-identification.

A summary of our biometric retention and destruction policy is available upon request. This summary includes the purpose of collection, categories of biometric data collected, retention periods, and deletion timelines in accordance with applicable law. Please contact legal@swatched.com to request a copy.

12.2 Health-Related Information

Some of our Services may collect information related to your health or physical conditions (such as skin conditions, allergies, or sensitivities) to provide personalized recommendations. This information:

- a) Is provided voluntarily by you
- b) Is used solely for the purpose of customizing your experience and recommendations
- c) Is not shared with third parties for advertising purposes without your explicit consent
- d) Is protected with enhanced security measures

12.3 Compliance with Biometric and Health Data Laws

We comply with all applicable laws regarding the collection, storage, and use of biometric and consumer health-related information, including:

- a) [Illinois Biometric Information Privacy Act \(BIPA\)](#)
- b) [Texas Capture or Use of Biometric Identifier Act](#)
- c) [Washington Biometric Identifier Law](#)
- d) [California Consumer Privacy Act \(CCPA/CPRA\)](#) provisions governing biometric and sensitive personal information

Swatched is not a covered entity under the Health Insurance Portability and Accountability Act (HIPAA) and does not collect Protected Health Information (PHI). Any health-related data voluntarily shared by users is used solely for cosmetic personalization and is governed by applicable state privacy laws.

12.4 AI Personalization Using Biometric and Health Data

If you choose to use features that analyze biometric or consumer health data (e.g., facial scans or skin condition inputs), those inputs may inform cosmetic product recommendations or illustrative application diagrams. These AI-driven outputs are **purely cosmetic** in nature and do not constitute medical advice or diagnosis.

As outlined in Section 3.3, Swatched makes **no guarantee** of product fit or performance and is **not liable** for allergic reactions, skin sensitivity issues, or dissatisfaction related to AI-generated suggestions.

12.5 Sensitive Data Consent Collection

Before collecting any biometric, health-related, or sensitive data, Swatched will present users with a consent interface. This interface includes checkboxes for:

- a) Consent to collect and use biometric data (e.g., facial scans)
- b) Consent to collect and use consumer health data (e.g., skin conditions, preferences)
- c) Consent to use such data for AI personalization
- d) Consent to analyze publicly accessible social media content for gifting insights

Each checkbox must be selected individually by the user before data is collected or processed. Users may withdraw these consents at any time through their account settings.

13. INTERNATIONAL DATA TRANSFERS

13.1 Data Storage Location

While our Services are directed exclusively to users in the United States, your personal information may be processed or stored in other countries where our service providers operate, such as for cloud infrastructure, analytics, or customer support.

We do not offer or market our Services to individuals located outside of the United States, including the European Economic Area (EEA), the United Kingdom, or other jurisdictions subject to the General Data Protection Regulation (GDPR) or UK GDPR. As such, Swatched is not subject to those laws at this time.

We do not knowingly allow access to our Services from individuals outside of the United States. Any incidental engagement by non-U.S. residents does not constitute targeting under applicable law. We recommend that users located in the EEA, UK, or other jurisdictions governed by GDPR or UK GDPR refrain from using our Services, as Swatched does not offer or market goods or services in those regions.

International Data Transfers

Although Swatched serves only U.S.-based users, some of our trusted service providers may store or process data in other countries, including but not limited to the United States, Canada, and EU member states.

We take reasonable steps to ensure that any cross-border data transfers are subject to appropriate safeguards, such as contractual protections, data minimization practices, and technical security measures. These steps are designed to ensure your personal information remains protected regardless of where it is processed.

13.2 Cross-Border Transfer Safeguards

When we transfer personal information outside of the United States, we implement appropriate safeguards to ensure that your information receives an adequate level of protection, which may include:

- a) Data processing agreements with standard contractual clauses
- b) Vendor assessments and security reviews
- c) Encryption and anonymization techniques
- d) Compliance with local data protection laws

14. CONTACT INFORMATION

14.1 Privacy Questions and Concerns

If you have any questions, concerns, or complaints about this Privacy Policy or our privacy practices, please contact us at:

Email: legal@swatched.com

Postal Address:

Swatched Beauty Inc.

8721 Santa Monica Blvd

Ste. 246

West Hollywood, CA 90069

14.2 Response Timeline

We will respond to all inquiries, concerns, and complaints within 30 days of receipt.

15. ADDITIONAL PROVISIONS

15.1 Severability

If any provision of this Privacy Policy is found to be unenforceable or invalid, such provision shall be limited or eliminated to the minimum extent necessary so that this Privacy Policy shall otherwise remain in full force and effect and enforceable.

15.2 Governing Law

This Privacy Policy shall be governed by and construed in accordance with the laws of the State of California, without regard to its conflict of law provisions.

15.3 Entire Agreement

This Privacy Policy, together with our [Terms and Conditions](#), constitutes the entire agreement between you and Swatched Beauty Inc. regarding the collection, use, and protection of your personal information.

16. State Privacy Rights Summary

The chart below summarizes key differences in consumer privacy rights under certain U.S. state laws. These rights may vary depending on your state of residence. Swatched applies the highest available standard to your data based on your jurisdiction and supports a unified mechanism for exercising your rights. You may submit a request at any time via our [privacy request form](#) or by contacting us at legal@swatched.com. We honor your preferences in accordance with applicable state laws. You may exercise your rights by emailing legal@swatched.com or using our [request form](#). We honor your preferences across all applicable jurisdictions.

State	Sensitive Data Consent	Profiling Opt-Out	GPC Recognition	Right to Correct	Right to Delete
California (CPRA)	Opt-out	Yes	Yes	Yes	Yes
Connecticut (CTDPA)	Opt-in	Yes	Yes	Yes	Yes
Colorado (CPA)	Opt-out	Yes	Yes	Yes	Yes
Virginia (VCDPA)	Opt-out	Yes	No	Yes	Yes
Utah (UCPA)	Opt-out	No	No	No	Yes
Nevada (SB220)	Sale only	No	No	No	No