

Sperry Insider Privacy Policy

Effective Date: February 18, 2015

Sperry Top-Sider, LLC (a subsidiary of Wolverine World Wide, Inc.) and its affiliates (collectively referred to as “Sperry,” “we,” “us,” or “our”) collect information about you when you take advantage of our online services or visit or interact with any of our websites, including www.sperryinsiders.com (the “Site”). This privacy policy (the “Policy”) describes: (1) the types of information we may collect about you and your use of the Site; (2) how we may use and share that information; and (3) the choices you may make with respect to your personal information. This Policy does not apply to information you may provide or make available to us in other ways, such as when you shop in our stores or contact us by e-mail or telephone.

Personal Information We Collect Directly From You

You provide us with your personal information when you communicate with us through the Site, including when you:

- Purchase products on the Site;
- Create or update an account on the Site;
- Subscribe to e-mail newsletters or updates;
- Submit product reviews;
- Complete, submit or otherwise participate in surveys or questionnaires; or
- Participate in contests, sweepstakes, or other promotions.

We collect non-public personal information you choose to provide, which may include your name, e-mail address, gender, date of birth, billing and shipping addresses, telephone number, or credit card information. We may also maintain your responses to all surveys, and questionnaires over time. Please do not submit information that you do not want us to have.

How We May Use Your Personal Information

We generally use your personal information to serve you, to improve our products and services, and to improve your consumer experience.

For example, we use personal information to provide products and services to you, communicate with you about those products and services, and enhance your experience on the Site. Specifically, your personal information may be used to process transactions, respond to questions, maintain online accounts, send you information about products or services that may be of interest to you, analyze and monitor visitor activity on the Site, provide product recommendations and reviews, publish the results of contests, sweepstakes, or other promotions, comply with our legal obligations, and develop a knowledge base regarding users of the Site.

In addition, we may combine your personal information with information that we receive from other sources, including from third party business partners. For example, we may use third party information to confirm contact information or to better understand your interests by associating demographic information with the information you have provided.

We may use the personal information you provide us to send you emails to invite you to participate in various programs, like surveys or focus groups. We may also email promotions and coupons to you to thank you for your feedback or participation in programs.

How We May Share Personal Information

Sperry may share your personal information with others for a number of different reasons. We may share your personal information to fulfill your requests, to provide you with information regarding products and services of ours or those of others, to comply with law, and to enforce our rights. We also may share personal information among our affiliated companies and to our successors or any of our brands or businesses.

Examples of how we may share your personal information include:

With Service Providers, Business Partners, and Vendors: If you purchase goods through our Site, we will have to provide credit card information to our credit card processor for payment purposes. We will also have to provide your name and address to the company that ships our merchandise. Similarly, we may share personal information with designers, manufacturers, distributors, licensees, marketing and advertising partners, and parties that provide services for the Site. We also may retain other companies and individuals to perform services on our behalf, and we may collaborate with other companies and individuals with respect to particular products or services (collectively, “Providers”). Examples of Providers include data analysis firms, credit card processing companies, customer service and support providers, email and SMS vendors, web hosting and development companies, and fulfillment companies. Providers also include our co-promotion partners for products that we jointly develop and/or market with other companies. Some Providers also may collect information on our behalf from our Site. These third parties may be provided with access to personal information needed to perform their functions.

To Comply with Law or to Protect Our Rights: We may disclose your personal information as required by law, when we believe disclosure is necessary to comply with a regulatory requirement, judicial proceeding, court order, or legal process served on us, or to protect the safety, rights, or property of our customers, the public, or Sperry.

To Members of the Corporate Family: Sperry may disclose your personal information to our subsidiaries and affiliates, and their agents and employees.

In Connection with Business Transfers: If we sell or transfer a company business unit (such as a product line or one or more affiliated companies) to a third party, we may share your personal information with that party.

Children

The Site is not designed to collect personal information from children who are under 13 years of age, and we do not intend to or knowingly collect such information.

Security

No security program is impenetrable, and criminals have proven adept at circumventing widely adopted security safeguards, so we cannot guarantee the security of personal information. Accordingly, you acknowledge that you provide personal information to us at your own risk.

Any user or third party accessing our website or services is responsible for its own use of the website and the services. We are not responsible for any third party’s actions or its security controls with respect to information that third parties may collect or process via the website, services, or otherwise.

Cookies and Other Tools That May Collect Information About You

In addition to personal information you may provide directly to us, Sperry and its business partners may collect and store information about you and your use of the Site through cookies, tracking pixels, and other technologies (collectively, “Tools”). Cookies are small text files that are stored by your browser on your computer’s hard drive. We collect, use, and modify this information to better understand, customize, and improve your experience with the Site and other websites, services, and offerings as well as to manage our advertising. For example, we use web analytics services that leverage these Tools to help us understand how visitors engage with and navigate our Site, *e.g.*, how and when pages on the Site are visited and by how many visitors. We are also able to offer our visitors a more customized and relevant experience on the Site by delivering, through the use of these Tools, content and functionality based on your preferences and interests. If you have provided us with personal information, *e.g.*, through a registration or a request for certain materials, we may associate that personal information with information gathered through the Tools. This allows us to offer increased personalization and functionality.

Do Not Track Disclosures

Do Not Track (“DNT”) is a privacy preference that users can set in their web browsers. When a user turns on DNT, the browser sends a message to websites requesting that they don’t track the user. At this time, we ignore these signals. We do not change our practices, described elsewhere in this Policy, in response to DNT browser settings or signals. In particular, even if you have turned on DNT, we and others will continue to collect information about you and your activity through the use of cookies, tracking pixels, and other Tools. For information about DNT, visit www.allaboutdnt.org.

Notice to California Residents

Under California law, California residents may request a list of all third parties to whom we have disclosed certain personal information (as defined by California law) during the preceding year for those third parties’ direct marketing purposes. If you are a California resident and would like to receive such a list, please contact us at Sperry Privacy Office 191 Spring Street, Lexington Massachusetts 02420. For any such request, include the statement “Your California Privacy Rights” in the body of your request, as well as your name, street address, city, state, and zip code. Please provide enough information for us to determine if this applies to you. You must also attest to the fact that you are a California resident and provide a current California address for our response. Please note that we will not accept requests via the telephone, email, or by facsimile, and we are not responsible for notices that are not labeled or sent properly or that do not have complete information.

Other Websites

The Site may contain links to websites of third parties who: (1) are not affiliated with us; (2) are outside our control; or (3) are not covered by this Policy (“Third-Party Websites”). Links provided to Third-Party Websites on the Site are provided to you only as a convenience, and the inclusion of any link does not imply reliability or endorsement by us of the content of any such Third-Party Websites. We are not responsible for the privacy practices of Third-Party Websites, which may collect and use information from you in a manner different than how we do so; accordingly, the use of such Third-Party Websites is entirely at your own risk. For relevant information, you should review the privacy statements or policies of any Third-Party Websites before using them. Other parties may collect information about your online activities over time and across different websites when you use our Site or services.

Accessing Personal Information

Please contact us if you have any questions or concerns about your personal information or require assistance in managing your choices.

To access, change, or delete your personal information, choose not to receive marketing or other promotional communications from us, or otherwise change your choices about how we use your personal information, or for any questions regarding this Policy, please: (1) update your account details online; (2) follow the unsubscribe instructions located at the end of any marketing communication from us; (3) e-mail us at support@sperryinsiders.com; (4) call us at 1-800-299-6575; or (5) write us at the following address with your message:

Sperry Top-Sider Privacy Office
191 Spring Street
Lexington, Massachusetts 02420

Please be sure to include in any e-mail or postal mail your full name, e-mail address, postal address, and any message. Please note that such requests may take up to thirty (30) days to become effective.

Transfer of Data to Other Countries

Any information you provide to Sperry through the use of the Site may be stored, processed, transferred among, and accessed from the United States and other countries which may not guarantee the same level of protection of personal information as the one in which you reside. However, Sperry will handle your personal information in accordance with this Policy regardless of where your personal information is kept.

Be Aware of "Phishing"

"Phishing" is a scam designed to steal your personal information. If you receive an email that looks like it is us asking you for your personal information, do not reply to it. We will not request your password, user name, credit card information or other personal information through email.

Updates to Our Privacy Policy

From time to time, we may post updates to this Policy. Any changes will be effective upon the posting of the revised Policy. We may also make, without notice, minor changes to the Policy that will not significantly affect our use of personal information. We encourage you to periodically review this page for the latest information on our privacy practices. This Policy was updated as of the effective date listed above.

Additional Information/Questions

If you have questions or concerns about our privacy policy or practices, please contact us at Sperry Top-Sider Privacy Office 191 Spring Street, Lexington Massachusetts 02420, or 1-800-299-6575.