



# Kwino Ecolu, LLC Privacy Policy

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## Privacy Policy

**Last Updated: August 5, 2026**

This Privacy Policy describes how Kwino Ecolux, LLC (“**Company**,” “**Kwino Ecolux**,” “**we**,” “**us**,” or “**our**”) collects, uses, discloses, and protects personal information when you visit or interact with kwino.com and piddel.com, including any related waitlist, pre-order, account, or checkout features (collectively, the “**Sites**” or the “**Service**”), or otherwise interact with us (for example, by phone, email, or on social media).

This Privacy Policy is intended to comply with the enforcement principles applied by the U.S. Federal Trade Commission (FTC) under Section 5 of the FTC Act (which prohibits unfair or deceptive practices, including inaccurate privacy representations), the California Consumer Privacy Act as amended by the California Privacy Rights Act (CCPA/CPRA), other applicable U.S. state comprehensive privacy laws, the EU/UK General Data Protection Regulation (GDPR) to the extent it applies to visitors in the EU/UK, and Canada’s Personal Information Protection and Electronic Documents Act (PIPEDA) to the extent it applies to visitors in Canada.

**A note on scope:** Kwino Ecolux is a small, pre-launch consumer products company. Some of the obligations described below (for example, certain CCPA/CPRA business obligations, which apply only once a business crosses specific revenue or data-volume thresholds, or full GDPR obligations, which apply based on where our users are located and how we target them) may not yet legally apply to us given our current size and stage. We are describing these rights and practices as a matter of transparency and good practice, and we will update this Policy as our business, user base, and legal obligations grow.

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## 1. Definitions

- “**Account**” means a registered user account on the Sites.
  - “**Personal Information**” / “**Personal Data**” means information that identifies, relates to, describes, or could reasonably be linked, directly or indirectly, with a particular individual or household.
  - “**Service Provider**” or “**Processor**” means a third party that processes Personal Information on our behalf.
  - “**Sites**” or “**Service**” means kwino.com and piddel.com, and any associated ordering, account, waitlist, or customer-support functionality.
  - “**You**” means the individual visiting or using the Sites, or the entity on whose behalf that individual is acting.
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## 2. Information We Collect

### 2.1 Information You Provide Directly

- **Waitlist / pre-launch reservation sign-up:** name and email address (and, if provided, phone number) when you join the PIDDEŁ waitlist or reserve a unit.



## Kwino Ecolu, LLC Privacy Policy

- **Account registration:** name, email address, and password. We do not currently offer “log in with Google/Facebook” or other third-party social login accounts are created and accessed using an email address and password only.
- **Orders and pre-orders:** billing and shipping name, address, email, phone number, and order details (items, quantities, order history). Full payment card numbers are not collected or stored by us directly - see Section 2.4.
- **Contact and customer support:** name, email, phone number, preferred contact method, subject, and message content when you use our Contact Us form, email us, or call our support line.
- **Product reviews and ratings:** if you submit a product review, we collect your name, email address, star rating, and review text. Reviews you submit publicly (excluding your email address, which is not displayed) may be shown on the relevant product page.
- **Communications:** records of correspondence if you contact us for support, warranty, or return requests.

### 2.2 Information Collected Automatically (“Usage Data”)

When you visit the Sites, we and our service providers automatically collect certain information, including your IP address, browser type and version, device identifiers, operating system, referring/exit pages, pages viewed, time spent on pages, and the date and time of your visit. This is described in more detail in our **Cookies Policy**.

### 2.3 Information From Advertising and Analytics Partners

We use Google Analytics, and advertising/retargeting pixels from Meta (Facebook/Instagram), TikTok, and Google Ads. These tools place cookies or similar identifiers on your device and share information about your interactions with the Sites (such as pages viewed, products viewed, or add-to-cart/purchase events) with those companies, which may combine it with information they hold about you from other sources for analytics and interest-based advertising purposes. See Section 7 and our Cookies Policy for more detail, and Section 9 for your choices.

### 2.4 Payment Information

Payments are processed by third-party payment processors (for example, PayPal and/or Stripe, and card networks such as Visa/Mastercard, plus wallet providers such as Apple Pay and Google Pay). These processors collect your payment card or bank details directly and provide us only with limited information necessary to process and confirm your order (such as a transaction ID, the last four digits of your card, and authorization status). We do not store full payment card numbers on our servers. Your payment information is subject to the privacy policy of the applicable payment processor.

### 2.5 Information We Do Not Collect

To be clear about the boundaries of what we collect: we do not knowingly collect health or medical information, biometric information, precise real-time geolocation, government ID numbers (such as Social Security numbers), or genetic information through the Sites.



## Kwino Ecolu, LLC Privacy Policy

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PIDDÈL is a consumer bathroom-hygiene product and is not a medical device; using the Sites or purchasing a PIDDÈL product does not involve providing us with medical or health data.

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### 3. How We Use Personal Information

We use the Personal Information described above to:

- Operate, maintain, and improve the Sites;
  - Create and manage your Account;
  - Process and fulfill orders, pre-orders, and waitlist reservations, including charging payment, shipping products, and providing order status and tracking updates;
  - Provide customer support, respond to inquiries, and handle warranty, return, and refund requests;
  - Send transactional communications (order confirmations, shipping notices, password resets, policy updates);
  - With your consent or where legally permitted, send marketing communications, including waitlist updates, pre-launch pricing offers, and newsletters via our email marketing platform (Klaviyo and/or Hubspot);
  - Display product reviews and ratings you choose to submit;
  - Analyze Site usage and traffic (via Google Analytics of similar tools) to understand and improve performance;
  - Serve and measure the effectiveness of advertising (via Meta, TikTok, and Google Ads pixels);
  - Detect, investigate, and prevent fraud, abuse, and security incidents;
  - Comply with legal obligations and enforce our Terms and Conditions.
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### 4. Legal Bases for Processing (EU/UK Visitors)

If you are located in the EU or UK, we process your Personal Data on one or more of the following legal bases under the GDPR/UK GDPR:

- **Consent** - for example, for non-essential cookies, advertising pixels, and marketing emails (which you may withdraw at any time);
  - **Performance of a contract** - to process your order, manage your Account, and provide the Service you requested;
  - **Legitimate interests** - for example, to secure and improve the Sites, prevent fraud, and for first-party analytics, balanced against your rights and interests;
  - **Legal obligation** - for example, tax, accounting, and consumer-protection recordkeeping.
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### 5. How We Share Personal Information

We share Personal Information with:



## Kwino Ecolu, LLC Privacy Policy

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- **Service providers / processors**, including: Google (Google Analytics; also Google Ads and Google Pay), Meta Platforms, Inc. (Meta/Facebook Pixel), TikTok Inc. (TikTok Pixel), Klaviyo, Inc. (email marketing), and PayPal and/or Stripe (payment processing), each acting on our behalf and, for the advertising and analytics tools, also for their own analytics/advertising purposes as described in Section 7;
- **Shipping and logistics providers**, to deliver your order and provide tracking information;
- **Professional advisors** (e.g., accountants, lawyers), as needed to run our business;
- **Successors**, in connection with a merger, acquisition, financing, or sale of some or all of our assets, in which case Personal Information may be among the transferred assets, subject to this Policy or a successor policy of which you will be notified;
- **Law enforcement or regulators**, where required by law, subpoena, court order, or to protect the rights, property, or safety of Kwino Ecolux, our users, or the public;
- **Affiliates**, such as any entity under common ownership with Kwino Ecolux (for example, in connection with the PIDDEl brand across kwino.com and piddel.com);
- **Others, with your consent.**

We do not share your Personal Information with unrelated third parties for their own independent marketing purposes without your consent.

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### 6. “Sale” and “Sharing” of Personal Information; Interest-Based Advertising

Because we use third-party advertising pixels (Meta, TikTok, Google Ads) and analytics tools (Google Analytics) that receive identifiers and browsing/device information from the Sites, this activity may be considered a “**sale**” or “**share**” of Personal Information under the CCPA/CPRA and similar state laws, even though we do not sell your information for cash. We do **not** sell Personal Information in exchange for money.

**Categories of information that may be “sold” or “shared” in this sense over the preceding 12 months:** identifiers (such as device/browser identifiers, IP address), and internet/network activity information (such as pages and products viewed).

**Your choice:** You can opt out of this sharing for advertising purposes at any time by: Using the cookie preference options described in our Cookies Policy; Enabling the Global Privacy Control (GPC) signal in a supported browser, which we will honor as an opt-out request where legally required; or Contacting us at the email address in Section 15 with the subject line “Do Not Sell or Share My Personal Information.”

We do not intentionally sell or share the Personal Information of individuals we know to be under 16 without opt-in consent as required by the CCPA/CPRA.

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### 7. Cookies and Similar Technologies

The Sites use cookies, pixels, and similar tracking technologies. Full details, including the categories of cookies we use, the third parties involved, and how to manage your



## Kwino Ecolu, LLC Privacy Policy

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preferences, are set out in our separate **Cookies Policy**, which forms part of this Privacy Policy by reference.

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### 8. Data Retention

We retain Personal Information for as long as reasonably necessary to fulfill the purposes described in this Policy, including to maintain your Account, complete transactions, comply with legal, tax, and accounting obligations (including warranty and return-related recordkeeping for at least the duration of our stated warranty periods), resolve disputes, and enforce our agreements. Waitlist and marketing contact information is retained until you unsubscribe or request deletion, subject to suppression-list recordkeeping we may need to retain to honor your opt-out. Usage/analytics data is generally retained on a shorter cycle in accordance with our analytics providers' default retention settings, unless a longer period is needed for security or legal reasons.

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### 9. Data Security

We use reasonable administrative, technical, and organizational measures designed to protect Personal Information, and we our best to user payment processors that uses industry-standard safeguards for payment data. However, no method of transmission over the internet or electronic storage is 100% secure, and we cannot guarantee absolute security.

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### 10. International Data Transfers

Kwino Ecolux, LLC is based in Florida, United States, and the Sites are hosted and operated in the United States. Because we ship internationally and support visitors from outside the United States (including, potentially, the EU, UK, and Canada), Personal Information we collect may be transferred to, stored in, and processed in the United States and other countries that may have different data protection laws than your country of residence. Where required (for example, for transfers of EU/UK personal data), we rely on appropriate safeguards such as Standard Contractual Clauses with our service providers, or your consent.

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### 11. Your Privacy Rights

#### 11.1 U.S. State Privacy Rights

If you are a resident of California, Colorado, Connecticut, Virginia, Utah, Oregon, Texas, Montana, or another U.S. state with a comprehensive consumer privacy law, you may have some or all of the following rights, subject to that state's specific requirements and exceptions:



## Kwino Ecolu, LLC Privacy Policy

- **Right to know/access** the categories and specific pieces of Personal Information we have collected about you, and the categories of sources, purposes, and third parties involved;
- **Right to correct** inaccurate Personal Information;
- **Right to delete** Personal Information we hold about you, subject to exceptions (e.g., completing a transaction, warranty/legal recordkeeping, security, and fraud prevention);
- **Right to opt out** of the “sale” or “sharing” of your Personal Information and of targeted/cross-context behavioral advertising (see Section 6);
- **Right to opt out of certain profiling** in furtherance of decisions that produce legal or similarly significant effects (not currently applicable, as we do not engage in this kind of profiling);
- **Right to non-discrimination** for exercising any of these rights;
- **Right to appeal** a denial of a rights request (available in several states).

**Categories of Personal Information we may have collected in the preceding 12 months** (using CCPA/CPRA category definitions): Identifiers (name, email, phone, IP address, order/account identifiers); Customer records information (billing/shipping address, order history); Commercial information (products viewed/purchased); Internet/network activity (Site usage data, cookie/pixel data); and, if you create login credentials, account login information (a category of “sensitive personal information” under CPRA, which we use only to operate your Account and do not use to infer characteristics about you).

We do not collect or knowingly process protected classification characteristics, biometric information, precise geolocation, genetic data, health information, or non-public education records, and we do not use or disclose sensitive personal information for purposes beyond what is reasonably necessary to provide the Service.

To exercise any of these rights, contact us using the information in Section 15. We will need to verify your identity (typically by confirming account or order details associated with your request) before responding, and we will respond within the timeframes required by applicable law (generally 45 days, extendable once by an additional 45 days with notice to you).

### 11.2 EU/UK (GDPR) Rights

If you are located in the EU or UK, you have the right to: access your Personal Data; request correction or erasure; restrict or object to processing; request data portability; and withdraw consent at any time (without affecting the lawfulness of processing before withdrawal). You also have the right to lodge a complaint with your local data protection supervisory authority.

### 11.3 Canada

If you are located in Canada, you may have rights under PIPEDA or applicable provincial privacy legislation to access and request correction of your Personal Information, similar to those described above. Contact us using the information in Section 15 to make a request.



## Kwino Ecolu, LLC Privacy Policy

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### 12. Children's Privacy

The Sites are not directed to children, and we do not knowingly collect Personal Information from anyone under the age of 13 (or under 16, for purposes of "selling" or "sharing" Personal Information under the CCPA/CPRA, without verified parental/guardian opt-in). If you are a parent or guardian and believe your child has provided us with Personal Information, please contact us at the email address in Section 15 so we can delete it. (Note: PIDDÈL as a physical product is described on our Sites as suitable for household members of all ages; that description relates to the physical product only and does not mean the Sites or checkout process are directed at or intended to be used by children.)

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### 13. Marketing Communications

If you sign up for our waitlist, newsletter, or otherwise opt in, we may send you marketing emails via Klaviyo and/or HubSpot about PIDDÈL, pre-launch pricing, and related updates. Every marketing email includes an unsubscribe link, and you may opt out at any time by using that link or by contacting us. We comply with the CAN-SPAM Act, including by identifying marketing messages, including our physical postal address (4581 Weston Rd #261, Weston, FL 33331, United States) in commercial emails, and honoring opt-out requests promptly.

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### 14. Third-Party Links

The Sites may link to third-party websites (including social media platforms such as Facebook, YouTube, and Instagram) that are not operated by us. We are not responsible for the privacy practices of those third parties, and we encourage you to review their privacy policies.

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### 15. Contact Us

If you have questions about this Privacy Policy or wish to exercise your privacy rights, contact us at:

**Kwino Ecolux, LLC** 4581 Weston Rd #261, Weston, FL 33331, United States Privacy inquiries: [info@kwino.com](mailto:info@kwino.com) General customer support: [support@kwino.com](mailto:support@kwino.com) Phone: 800-988-7484

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### 16. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will post the updated version on this page with a revised "Last Updated" date, and where changes are material, we will provide additional notice (such as an email to registered users or a prominent Site notice) before the changes take effect as much as feasible.