

The privacy practices of this statement apply to our services available under the domain and sub-domains of www.hawaiianfashionplace.com. For simplicity, we refer to the publisher of the domain, Hawaiian Fashion Place located in 866 Iwilei Rd Suite 227, Honolulu, HI 96817, U.S.A. as 'HFP', 'us' or 'we'.

Your privacy is very important to us. We do not sell or rent your personal information to third parties for their marketing purposes without your express consent. Please read this Privacy Policy to learn more about the ways in which we use and protect your personal information. By visiting this website you agree to be bound by the terms and conditions of this Privacy Policy. If you do not agree please do not use or access our HFP.

1. Introduction

This Privacy Policy describes the information, as part of the normal operation of our services, we collect from you and what may happen to that information. By accepting this Privacy Policy in registration, you expressly express consent to our use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy is effective upon acceptance in registration for new registering users, and is otherwise effective on November 1st, 2008 for all users.

2. Information We Collect

Our primary purpose in collecting personal information is to provide you with a safe, smooth, efficient, and customized experience. This allows us to provide services and features that we hope will meet your needs, and to customize our service to make your experience safer and easier. We only collect personal information about you that we consider necessary for achieving this purpose. In general, you can browse the HFP without telling us who you are or revealing any personal information about yourself. Once you give us your personal information, you are not anonymous to us. If you choose to use our services, we may require you to provide contact and identity information, billing information, shipping information and other personal information as indicated on the forms throughout the HFP. Where possible, we indicate which fields are

required and which fields are optional. You always have the option to not provide information by choosing not to use a particular service or feature.

Under some circumstances we may require some additional financial information, such as, but not limited to: if you are registering using an email account at a free email service, or registering to buy products on the HFP. We use your financial information, including credit card information to verify the accuracy of your name, address, and other information, as well as to bill you for your use of our services.

We automatically track certain information based upon your behavior on the HFP. We use this information to do internal research on our users' demographics, interests, and behavior to better understand, protect and serve you and our HFP community. This information may include the URL that you just came from (whether this URL is on the HFP or not), which URL you next go to (whether this URL is on the HFP or not), your computer browser information, and your IP address.

We use data collection devices such as "Cookies" on certain pages of the HFP to help analyze our web page flow, measure promotional effectiveness, and promote trust and safety. Cookies are small files placed on your hard drive that assist us in providing our services. We offer certain features that are only available through the use of a cookie. We also use cookies to allow you to enter your password less frequently during a session. Cookies can also help us provide information that is targeted to your interests. Most cookies are "session cookies," meaning that they are automatically deleted from your hard drive at the end of a session. You are always free to decline our cookies if your browser permits, although in that case you may not be able to use certain features on the HFP and you may be required to reenter your password more frequently during a session.

Additionally, you may encounter "cookies" or other similar devices on certain pages of the HFP that are placed by third parties. For example, if you view a web page created by a user, there may be a "cookie" placed within that web page. We do not control the use of cookies by third parties.

If you establish a credit account with us to pay the fees we charge, we collect some additional information, such as a billing address, credit card number and a credit card expiration date and tracking information from checks or money orders.

If you choose to post messages in our Message Boards or other message areas, we will collect that information you provide to us. Our system automatically records and stores the Internet protocol ('IP') address where all Message Board postings originate. So, if you post messages in the Message Boards, your IP address will be logged and stored on our system. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law.

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the HFP, we may collect such information into a file specific to you.

3. Our Use of Your Information

We use your personal information to facilitate the services you request. We use your personal information in the file we maintain about you, and other information we obtain from your current and past activities on the HFP to: resolve disputes; troubleshoot problems; help promote safe purchasing; collect fees owed; measure consumer interest in our products and services, inform you about online and offline offers, products, services, and updates; customize your experience; detect and protect us against error, fraud and other criminal activity; and as otherwise described to you at the time of collection. At times, we may look across multiple users to identify problems or resolve disputes, and in particular we may examine your personal information to identify users using multiple User IDs or aliases. We may compare and review your personal information for errors, omissions and for accuracy. If you order an item on the HFP or otherwise provide us with your financial information, we use your address and billing information to bill you and provide associated support.

You agree that we may use personal information about you to improve our marketing and promotional efforts, to analyze HFP usage, improve our content and product offerings, and customize the HFP's content, layout, and services. These uses improve the HFP and better tailor it to meet your needs, so as to provide you with a smooth, efficient, safe and customized experience while using the HFP.

You agree that we may use your personal information to contact you and deliver information to you that, in some cases, are targeted to your interests, such as targeted advertisements,

administrative notices, product offerings, and communications relevant to your use of the HFP. By accepting this Privacy Policy, you expressly agree to receive this information. If you do not wish to receive these communications, we encourage you to opt out of the receipt of certain communications on the notification preferences page.

4. Our Disclosure of Your Information

As a matter of this Privacy Policy, we do not sell or rent any of your personal information to third parties for their marketing purposes without your express consent. However, the following describes some of the ways that your personal information may be disclosed in the normal scope of business to provide our services. a. Advertisers. We aggregate (gather up data across all user accounts) personal information and disclose such information in a non-personally identifiable manner to advertisers and other third parties for their marketing and promotional purposes. However, in these situations, we do not disclose to these entities any information that could be used to identify you personally. Certain information, such as your name, email address, password, credit card number, and bank account number, are not disclosed to these third parties in a personally identifiable manner without your express consent.

b. External Service Providers. There are a number of separate services offered by third parties that we refer to as external service providers that may be complimentary to your use of the HFP (e.g. payment gateway, authentication, mediation organizations). If you choose to use these separate services, disclose information to the external service providers, and/or grant them permission to collect information about you, then their use of your information is governed by their this Privacy Policy. We do not disclose your personal information to external service providers unless you provide your express consent. With your express consent we may provide some of your personal information to the external service provider offering such services, for your convenience. To prevent our disclosure of your personal information to an external service provider, you can decline such express consent or simply not use their services. Because we do not control the privacy practices of these third parties, you should evaluate their practices before deciding to use their services. Users who register on a HFP co-branded web HFP grant HFP permission to pass your email address back to that co-branded web HFP. The use of your email address by the co-brand web HFP is limited by their applicable privacy policies.

c. Internal Service Providers for Our Operations. We may use third parties that we refer to as internal service providers to facilitate or outsource one or more aspects of the business, product and service operations that we provide to you (e.g., search technology, discussion boards, bill collection, affiliate and rewards programs, co-branded credit cards) and therefore we may provide some of your personal information directly to these internal service providers. These internal service providers' are subject to confidentiality agreements with us and other legal restrictions that prohibit their use of the information we provide them for any other purpose except to facilitate the specific outsourced HFP related operation, unless you have expressly agreed or given your prior permission to them for additional uses. In some instances, the internal service provider may collect information directly from you (such as for HFP surveys or for a co-branded credit card). In these cases, you will be notified of the involvement of the internal service provider, and all additional information you provide them and their additional uses will be strictly up to you. If you provide additional information to an internal service provider directly, then their use of your personal information is governed by their applicable this Privacy Policy.

d. Other Corporate Entities. We share much of our data, including personal information about you, with our subsidiaries and joint ventures that are committed to serving your online trading needs and related services, throughout the world. To the extent that these entities have access to your information, they will treat it at least as protectively as they treat information they obtain from their other users. Our subsidiaries and joint ventures follow privacy practices no less protective of all users than our practices described in this document, to the extent allowed by applicable law. HFP, its subsidiaries, its joint ventures, or any combination of such, will share some or all of your personal information with another business entity should we plan to, merge with, or be acquired by that business entity. Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal information. If your personal information will be used contrary to this Privacy Policy, you will receive prior notice in as provided in Section 8 ("Notices & Policy Modifications").

e. Legal Requests. HFP cooperates with law enforcement inquiries, as well as other third parties to enforce laws, such as: intellectual property rights, fraud and other rights, to help protect you and the HFP community from bad actors. Therefore, in response to a verified request by law enforcement or other government officials relating to a criminal investigation or alleged illegal activity, we can (and you authorize us to) disclose your name, city, state, telephone number, email address, User ID history, fraud complaints and listing history without a subpoena. Without limiting the above, in an effort to respect your privacy and our ability to keep the community free from bad actors, we will not otherwise disclose your personal information to law

enforcement or other government officials without a subpoena, court order or substantially similar legal procedure, except when we believe in good faith that the disclosure of information is necessary to: prevent imminent physical harm or financial loss; or report suspected illegal activity.

Due to the existing regulatory environment, we cannot ensure that all of your private communications and other personal information will never be disclosed in ways not otherwise described in this Privacy Policy. By way of example (without limiting the foregoing), we may be forced to disclose personal information to the government or third parties under certain circumstances, third parties may unlawfully intercept or access transmissions or private communications, or users may abuse or misuse your personal information that they collect from the HFP. Therefore, although we use industry standard practices to protect your privacy, we do not promise, and you should not expect, that your personal information or private communications will always remain private.

5. Control of Your Password

You are responsible for all actions taken with your User ID and password. Therefore we do not recommend that you disclose your HFP password to any third parties. If you choose to share your User ID and password or your personal information with third parties, you are responsible for all actions taken with your account and therefore you should review that third party's this Privacy Policy. If you lose control of your password, you may lose substantial control over your personal information and may be subject to legally binding actions taken on your behalf. Therefore, if your password has been compromised for any reason, you should immediately change your password.

6. Other Information Collectors

Except as otherwise expressly included in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you. To the extent that you disclose your information to other parties, whether they are buyers or sellers on our HFP or other HFPs throughout the Internet, different rules may apply to their use or disclosure of the information you disclose to them. Since we do not control the privacy policies of third parties, you are

subject to the privacy policies of that third party. We encourage you to ask questions before you disclose your personal information to others.

7. Security

Your information is stored on HFP's servers located in the United States. We use procedural and technical safeguards to protect your personal information against loss or theft as well as unauthorized access and disclosure to protect your privacy. We treat data as an asset that must be protected against loss and unauthorized access. We employ many different security techniques to protect such data from unauthorized access by users inside and outside the company. However, "perfect security" does not exist on the Internet.

8. Notices & Policy Modifications

We may update this Privacy Policy. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your account or by placing a prominent notice on our HFP.

Questions:

If you have any questions about this Privacy Policy, please email us at privacy@hawaiianfashionplace.com.