

dew theory

S K I N — C A R E

Privacy Policy

Legal Policy

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LAST UPDATED · AUGUST 15, 2026

DEWTHEORYCO.COM

ATTORNEY REVIEW DRAFT
BLOCKED PENDING P0 FACTS

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STATUS
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PUBLICATION / USE
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Drafting basis. This document is tailored to the public Dew Theory website audited on August 15, 2026. Where the live site expressly identifies a feature or commercial term as a mock, working draft, unconfigured, or not finalized, this document does not convert that item into a binding promise. Bracketed decision markers are publication gates and are cross-referenced in DEW_THEORY_LEGAL_OPEN_ITEMS.

1. Scope and operator

This Privacy Policy explains how personal information is collected, used, disclosed, and protected when a person visits dewtheoryco.com, shops for skincare, contacts Dew Theory, requests or books an aesthetic service, completes a skin quiz or routine builder, participates in a virtual consultation, or otherwise interacts with Dew Theory.

Dew Theory is the trade name presented on the Site. **[BUSINESS DECISION REQUIRED: confirm the legal entity that operates dewtheoryco.com, the merchant of record, state of organization, and principal business/ mailing address.]** This Policy should not be published as the operative privacy policy until that identity and a privacy-request contact channel are confirmed.

Privacy requests: **[BUSINESS DECISION REQUIRED: publish a monitored privacy email address and mailing address.]** The public Contact form may be used for general support, but a dedicated privacy channel is recommended before launch.

2. Information Dew Theory may collect

Depending on the feature used, Dew Theory may collect:

- **Identifiers and contact information:** name, email address, telephone number, shipping address, billing-related information received from payment providers, and messages submitted through support forms.
- **Order and transaction information:** products, quantities, price, discounts, taxes, shipping charge, order status, shipment-related information, refunds, customer-service history, and payment transaction

identifiers. Full card numbers should remain with the configured payment processor rather than Dew Theory's application.

- **Appointment information:** requested service, appointment date and time, booking status, deposit/payment status when enabled, cancellation/rescheduling history, and communications about the appointment.
- **Consultation, skin and intake information:** skin concerns and condition as described by the client, sensitivity, allergies or reactions when asked, current products, treatment history, prescription skincare or medication information the client chooses or is asked to disclose, lifestyle information relevant to the consultation, hormonal or pregnancy-related information if a future intake form asks for it, goals, notes, and recommendations.
- **Photographs and media:** consultation photographs or videos submitted for service use, and separately authorized before/after, testimonial, portfolio, advertising, or social-media media.
- **Quiz and routine information:** answers to skin quiz or routine-builder questions, recommended routines, product selections, and related interactions.
- **Device and browser information:** IP address, browser/device characteristics, timestamps, request logs, and security/diagnostic data where collected by hosting or infrastructure providers.
- **Browser storage and first-party state:** the current site states that cart contents and promo-code state are stored in browser `localStorage`. Staff/admin authentication uses an `httpOnly` cookie. First-party funnel events may be recorded; no third-party analytics or advertising network was publicly identified in the August 15, 2026 audit.
- **Marketing preferences:** email signup, promotional communication preferences, unsubscribe status, and membership-interest information if submitted.

Dew Theory should collect only information reasonably necessary for the requested service, transaction, legal obligation, security purpose, or separately disclosed business purpose.

3. Sources of information

Information may come directly from the consumer; from the consumer's browser or device; from the configured payment, booking, video, email, hosting, storage, fulfillment, or fraud-prevention provider; from a parent or guardian for a minor; or from a person who communicates with Dew Theory on another person's behalf with appropriate authority.

4. How information is used

Dew Theory may use personal information to operate the Site; maintain a cart; process and fulfill orders; calculate shipping and taxes; provide support; prevent fraud and abuse; schedule and administer services; prepare for consultations; review intake information and service-use photos; provide aesthetic skincare recommendations; send transactional communications; maintain business and consent records; administer promotions; maintain security; comply with law; establish or defend legal claims; and, with any consent required by law, send marketing or use media for promotional purposes.

Sensitive skin or health-related information should not be repurposed for targeted advertising or unrelated profiling without a fresh legal review and any consent required by applicable consumer-health-data law.

5. Payments

The current public site describes Stripe as the intended payment provider when production credentials are configured and states that Dew Theory does not store full card data in its site application. **[TO CONFIRM: production payment processor and merchant-of-record configuration.]** Payment providers independently process information under their own notices and contractual obligations.

6. Service providers and disclosures

Dew Theory may disclose information to service providers and processors only as reasonably needed to perform contracted functions, such as payment processing, hosting/infrastructure, secure data or image storage, transactional email, video conferencing, booking/calendar functions, fulfillment/shipping, professional advisors, and security/fraud prevention. The current website publicly identifies or contemplates Stripe, Zoom, Google Calendar and Resend in specific flows, but several are described as unconfigured or mock. They must not be represented as production vendors until verified.

Dew Theory may also disclose information when reasonably necessary to comply with law or valid legal process; protect customers, Dew Theory, or others; investigate fraud or security incidents; enforce agreements; or complete a corporate transaction subject to appropriate safeguards.

7. Sale, sharing and targeted advertising

The August 15, 2026 public-site audit did not identify a deployed advertising pixel or retargeting network and the existing privacy page expressly avoids naming one. Accordingly, this draft does **not** state that Dew Theory sells or shares personal information for cross-context behavioral advertising. If advertising technology, data brokerage, audience matching, or targeted-advertising tools are added, Dew Theory must update this Policy, assess state opt-out duties, implement Global Privacy Control where required, and obtain consent where required before activation.

Dew Theory should not sell consumer health data. Any future activity that may constitute a statutory "sale" of consumer health data requires a separate written authorization process where applicable.

8. Cookies, localStorage and similar technology

The current implementation uses browser `localStorage` for cart and promo-code persistence and an `httpOnly` cookie for staff/admin sessions. Additional cookies or storage may be used by production infrastructure or embedded services when actually configured. See the Cookie and Tracking Technologies Notice for the current inventory and change-control requirements.

9. Consumer health data

Skin concerns, treatment history, medication or prescription-skincare information, hormonal/pregnancy information, photographs, and inferences about physical condition can qualify as consumer health data under laws that protect health data outside HIPAA. Dew Theory's separate Consumer Health Data Privacy Policy is

marked conditional because geographic scope and production intake flows are not yet confirmed. If Dew Theory makes the virtual consultation or qualifying intake available to residents covered by Washington's My Health My Data Act, Nevada's consumer-health-data law, or another applicable regime, the separate policy and required consent/rights workflow must be deployed before collection.

Based on the public facts reviewed, Dew Theory does not presently appear to be a HIPAA covered entity or business associate merely by operating an aesthetic skincare retail and consultation business. That conclusion must be revisited if Dew Theory begins providing covered healthcare transactions or receives protected health information as a business associate of a covered entity.

10. Retention

Dew Theory should retain personal information only for as long as reasonably necessary for the disclosed purposes, including order fulfillment, tax/accounting, customer support, service continuity, consent evidence, fraud/security, legal claims, and legal obligations. **[BUSINESS DECISION REQUIRED: approve a written retention schedule for orders, support messages, consultation/intake records, photographs, consent records, marketing records, and technical logs.]** Health-data and media retention should be purpose-limited and no longer than necessary.

11. Security

Dew Theory should use administrative, technical, and physical safeguards appropriate to the nature of the information, including access controls, least privilege, secure transport, private object access for consultation photos, protected admin sessions, vendor diligence, secret management, patching, backups where appropriate, and incident response. No method of transmission or storage is risk-free, and this Policy does not promise absolute security.

12. Privacy rights and requests

Depending on residence and whether a particular law applies to Dew Theory, a consumer may have rights to request access, confirmation, correction, deletion, portability, or information about disclosures, and to opt out of certain sales, targeted advertising, profiling, or other processing. Some laws require an appeal mechanism or recognition of an opt-out preference signal.

Dew Theory should honor verified requests to the extent required by applicable law and may request information reasonably necessary to authenticate the request. **[BUSINESS DECISION REQUIRED: privacy-request channel, identity-verification workflow, appeal channel, and response-owner.]** Requests should be documented and completed within applicable statutory timeframes.

12.1 California

California's Online Privacy Protection Act can require a conspicuously posted privacy policy for commercial websites collecting personally identifiable information from California consumers. CCPA/CPRA obligations depend on statutory coverage thresholds and processing practices; current Dew Theory revenue, volume, and

sharing facts were not publicly verifiable. If CCPA/CPRA applies, Dew Theory must add the required notices, rights handling, service-provider/contractor terms, opt-out mechanisms, and Global Privacy Control support as applicable.

12.2 Other U.S. states

Colorado, Connecticut, Virginia, Utah, Texas, Oregon, Montana, Delaware, Iowa, Indiana, Tennessee, New Jersey, Maryland, Minnesota, Nebraska, New Hampshire, Kentucky, Rhode Island, and other states have enacted comprehensive privacy laws with differing coverage tests, exemptions, effective dates, sensitive-data rules, and rights. Dew Theory's current sales territory and processing scale are unknown. This draft provides a baseline framework but does not claim that every listed statute applies. Coverage should be re-assessed at launch and at least annually or when operations materially expand.

13. Children and minors

The Site markets routines to "teens," but the current audit did not identify an age gate or finalized minimum service age. Dew Theory should not knowingly collect personal information online from a child under 13 without a COPPA-compliant parental-consent process. Intake and photo flows should include age screening. Minor aesthetic services require state-specific scope review and parent/guardian authorization before activation. See the Minor Client Parent/Guardian Consent.

14. Marketing communications

Promotional email should be sent only through an approved system that maintains suppression/unsubscribe status and supplies the disclosures and opt-out mechanism required by CAN-SPAM and applicable state law. Transactional messages should be limited to service/order communications unless marketing consent or another lawful basis is present. **[TO CONFIRM: production email provider, sending domain/from-address, mailing-list source, and consent record.]**

15. Policy changes

Dew Theory may update this Policy as the business, vendors, products, services, or laws change. Material changes should be dated and, where required, communicated or consented to before applying a new use to previously collected data. The published policy version and effective date should be stored with material consent events.

16. Contact

Privacy questions and rights requests: **[BUSINESS DECISION REQUIRED: privacy email and mailing address.]** General support may be initiated through the Contact page at dewtheoryco.com/contact once that channel is confirmed operational.