# **Privacy Policy**

This Privacy Policy ("Policy") applies to www.redrockspokane.com and Red Rock Catering & Events ("Company" or "We") and governs data collection and usage for the business and its affiliates, The Glover Mansion, Chateau Rive, and Spokane Valley Event Center. For the purposes of this Privacy Policy, unless otherwise noted, all references to the Company and we include:

- www.redrockspokane.com
- www.redrockcateringandevents.com
- www.glovermansion.com
- www.chateaurive.com
- www.spokanevalleycenter.com.

The Company's websites are informational sites. By using the Company website, you consent to the data practices described in this statement.

## **Collection of your Personal Information**

In order to better provide you with products and services offered, the Company may collect personally identifiable information, such as your:

- First and last name,
- Email address.
- Phone number,
- Employer Information
- Other relevant information to fulfill a service request.

If you purchase the Company's products and services, we collect billing and credit card information. This information is used to complete the purchase transaction.

The Company may also collect anonymous demographic information, which is not unique to you, such as your:

- Age
- Gender
- Race
- Household income
- Other relevant information to improve user experience,
- Other information automatically collected by analysis software.

We do not collect any personal information about you unless you voluntarily provide it to us. However, you may be required to provide us with certain personal information when you elect to use certain products or services. These may include: (a) registering for an account; (b) entering a sweepstakes or contest sponsored by us or one of our partners; (c) signing up for special offers from selected third parties; (d) sending us an email message; (e) submitting your credit card or

other payment information when ordering and purchasing products and services. To wit, we will use your information for, but not limited to, communicating with you about services and/or products you requested. We also may gather additional personal or non-personal information in the future

## **Use of your Personal Information**

The Company collects and uses your personal information in the following ways:

- To operate and deliver the services you have requested,
- To provide you with information, products, or services that you request from us,
- to provide you with notices about your account,
- To carry out the Company's obligations and enforce our rights arising from any contracts entered between you and us, including for billing and collection,
- To notify you about changes to our websites or any products or services we offer or provide through them,
- In any other way, we may describe when you provide the information,
- For any other purpose with your consent.

The Company may also use your personally identifiable information to inform you of other products or services available from the Company and its affiliates.

## **Sharing Information with Third Parties**

The Company does not sell, rent, or lease its customer lists to third parties.

The Company may share data with trusted partners to help perform statistical analysis, send you email or postal mail, provide customer support, or arrange deliveries. All such third parties are prohibited from using your personal information except to provide these services to the Company, and they are required to maintain the confidentiality of your information.

Some of the third parties used to improve your experience include:

- Google Products (including Google Analytics, Google Ads, and other relevant products)
- Social Media platforms, when applicable (including Meta, LinkedIn, and other relevant platforms),
- Email Marketing platforms (including Brevo, Constant Contact, MailChimp, HubSpot, and any other relevant software needed to provide you with requested services),
- Website building software (including WiX, Squarespace, GoDaddy, Word Press, Weebly, and/or any other platform deemed necessary by the Company to provide the services requested by the site visitor or any service requestor).
- Other software for statistical analysis as deemed appropriate by the Company and the agreement entered upon negotiation of services to be provided.

The Company may disclose your personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the

law or comply with legal process served on the Company or the site; (b) protect and defend the rights or property of the Company; and/or (c) act under exigent circumstances to protect the personal safety of users of the Company, or the public.

#### **Tracking User Behavior**

The Company may keep track of the websites and pages our users visit within the Company in order to determine what the Company services are the most popular. This data is used to deliver customized content and advertising within the Company to customers whose behavior indicates interest in a particular subject area.

## **Automatically Collected Information**

The Company may automatically collect information about your computer hardware and software. This information can include your IP address, browser type, domain names, access times, and referring website addresses. This information is used for the service's operation, to maintain service quality, and to provide general statistics regarding the use of the Company's website.

#### Use of Cookies

The Company's website may use "cookies" to help you personalize your online experience. A cookie is a text file placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. For example, if you personalize the Company's pages or register with the Company's site or services, a cookie helps the Company to recall your specific information on subsequent visits. This simplifies operational processes, including recording your personal information, such as billing addresses, shipping addresses, and other pertinent information. When you return to the same website, the information you previously provided can be retrieved, making it easier for you to use the Company's features you previously customized.

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies We use may include:

• <u>Cookies or Browser Cookies</u>: A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.

• Web Beacons: Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser. We use both Session and Persistent Cookies for the purposes set out below:

- Necessary / Essential Cookies
  - Type: Session Cookies
  - Administered by: Company
  - Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.
- Cookies Policy / Notice Acceptance Cookies
  - Type: Persistent Cookies
  - Administered by: Company
  - Purpose: These Cookies identify if users have accepted the use of cookies on the Website.
- Functionality Cookies
  - Type: Persistent Cookies
  - Administered by: Company
  - Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.
- Tracking and Performance Cookies
  - Type: Persistent Cookies
  - Administered by: Third-Parties
  - O Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to

test new pages, features or new functionality of the Website to see how our users react to them.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Company's services or websites you visit.

#### Links

This website contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

## **Security of your Personal Information**

The Company secures your personal information from unauthorized access, use, or disclosure. The Company uses the following methods for this purpose:

SSL Protocol

When personal information (such as a credit card number) is transmitted to other websites, it is protected through encryption, such as the Secure Sockets Layer (SSL) protocol.

We strive to take appropriate security measures to protect against unauthorized access to or alteration of your personal information. Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet that are beyond our control; and (b) the security, integrity, and privacy of any and all information and data exchanged between you and us through this site cannot be guaranteed.

## **Right to Deletion**

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records, and
- Direct any service providers to delete your personal information from their records.

Please note that we may not be able to comply with requests to delete your personal information if it is necessary to:

• Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, and provide a good or service requested by you, or reasonably anticipated within the

- context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with an existing legal obligation; or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

#### **Children Under Thirteen**

The Company does not knowingly collect personally identifiable information from children under the age of 13. If you are under the age of 13, you must ask your parent or guardian for permission to use this website.

#### Disconnecting your Company's Account from Third Party Websites

You will be able to connect your Company's account to third-party accounts. By connecting your Company's account to your third-party account, you acknowledge and agree that you are consenting to the continuous release of information about you to others (in accordance with your privacy settings on those third-party sites). If you do not want information about you, including personally identifying information, to be shared in this manner, do not use this feature. You may disconnect your account from a third-party account at any time.

#### **Email Communications**

From time to time, the Company may contact you via email for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication. In order to improve our services, we may receive a notification when you open an email from the Company or click on a link therein.

If you would like to stop receiving marketing or promotional communications via email from the Company, you may opt out of such communications by clicking on the unsubscribe button in the emails we send out.

#### **External Data Storage Sites**

We may store your data on servers provided by third-party hosting vendors with whom we have contracted.

## **Privacy Policy Updates Regarding California Residents**

The Company operates from and provides services in Washington, we recognize that there might be California residents who access the company's website and wish to procure services from the Company. To this end, we recognize the rights of the website visitors set by the State of California and the CCPA Privacy Policy. The Company is committed to respecting and abiding by their guidelines. The Company encourages users who fall under the umbrella of the CCPA and other relevant policies to contact us with questions and/or concerns not addressed within this Policy regarding the data we've collected, how we use it, and how a user could request the deletion of said data, as well as the process the Company would pursue to abide by the guidelines and the customer's request. See Appendix A for more information.

# Updates Regarding the General Data Protection Regulation (GDPR) and the European Digital Markets Act (DMA) for Citizens of the European Union (EU)

While the Company operates from and provides services in the United States of America (USA), we recognize that there might be European citizens who access the company's website and wish to procure services from the Company. To this end, we recognize the rights of the website visitors set by the GDPR and the DMA and are committed to respecting and abiding by their guidelines. The Company encourages users who fall under the umbrella of the GDPR and the DMA to contact us with questions and/or concerns not addressed within this Policy regarding the data we've collected, how we use it, and how a user could request the deletion of said data, as well as the process the Company would pursue to abide by the guidelines and the customer's request. See Appendix B for more information.

## **Changes to This Statement**

The Company reserves the right to change this Policy from time to time. For example, when there are changes in our services, changes in our data protection practices, or changes in the law. When changes to this Policy are significant, we will inform you. You may receive a notice by email to the primary email address specified in your account, by placing a prominent notice on our Red Rock Catering & Events websites, and/or by updating any privacy information. Your continued use of the website and/or services available after such modifications will constitute your: (a) acknowledgment of the modified Policy; and (b) agreement to abide and be bound by that Policy.

#### **Contact Information**

The Company welcomes your questions or comments regarding this Policy. If you believe that the Company has not adhered to this Policy, please contact the our marketing and communications team at:

#### Mediabus

140 S Arthur St., Suite 505

Spokane, WA 99202

Email Address: contact@getmediabus.com

Phone Number: (509) 703-0296

Effective as of May 22, 2024

# **Appendix A: CCPA Privacy Policy**

This privacy notice section for California residents supplements the information contained in Our Privacy Policy and it applies solely to all visitors, users, and others who reside in the State of California.

#### **Categories of Personal Information Collected**

The Company collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or Device. The following is a list of categories of personal information which we may collect or may have been collected from California residents within the last twelve (12) months.

Please note that the categories and examples provided in the list below are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact collected by the Company, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been collected. For example, certain categories of personal information would only be collected if You provided such personal information directly to the Company.

- Identifiers,
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)),
- Protected classification characteristics under California or Federal law,
- Commercial information,
- Biometric information,
- Internet or other similar network activity,
- Geolocation data,
- Sensory data,
- Professional or employment-related information,
- Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)),
- Inferences drawn from other personal information.

#### Under CCPA, personal information does not include:

- Publicly available information from government records,
- Deidentified or aggregated consumer information,
- Information excluded from the CCPA's scope, such as:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data,

 Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994

#### **Sources of Personal Information**

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from You. For example, from the forms You complete on our Service, preferences You express or provide through our Service, or from Your purchases on our Service.
- Indirectly from You. For example, from observing Your activity on our Service.
- Automatically from You. For example, through cookies We or our Service Providers set on Your Device as You navigate through our Service.
- From Service Providers. For example, third-party vendors to monitor and analyze the use of our Service, third-party vendors for payment processing, or other third-party vendors that We use to provide the Service to You.

## **Use of Personal Information for Business Purposes or Commercial Purposes**

We may use or disclose personal information We collect for "business purposes" or "commercial purposes" (as defined under the CCPA), which may include the following examples:

- To operate our Service and provide You with our Service.
- To provide You with support and to respond to Your inquiries, including to investigate and address Your concerns and monitor and improve our Service.
- To fulfill or meet the reason You provided the information. For example, if You share Your contact information to ask a question about our Service, We will use that personal information to respond to Your inquiry. If You provide Your personal information to purchase a product or service, We will use that information to process Your payment and facilitate delivery.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to You when collecting Your personal information or as otherwise set forth in the CCPA.
- For internal administrative and auditing purposes.
- To detect security incidents and protect against malicious, deceptive, fraudulent or illegal activity, including, when necessary, to prosecute those responsible for such activities.

Please note that the examples provided above are illustrative and not intended to be exhaustive. For more details on how we use this information, please refer to the "Use of Your Personal Data" section.

If the Company decides to collect additional categories of personal information or use the personal information We collected for materially different, unrelated, or incompatible purposes We will update this Privacy Policy.

## Disclosure of Personal Information for Business Purposes or Commercial Purposes

We may use or disclose and may have used or disclosed in the last twelve (12) months the following categories of personal information for business or commercial purposes:

- Identifiers
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Commercial information
- Internet or other similar network activity

Please note that the categories listed above are those defined in the CCPA. This does not mean that all examples of personal information were in fact disclosed, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been disclosed.

When the Company discloses personal information for a business purpose or a commercial purpose, We enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

#### **Sale of Personal Information**

As defined in the CCPA, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for valuable consideration. This means that We may have received some kind of benefit in return for sharing personal information, but not necessarily a monetary benefit.

Please note that the categories listed below are those defined in the CCPA. This does not mean that all or any of the categories of personal information were in fact sold, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been shared for value in return.

We may sell and may have sold in the last twelve (12) months the following categories of personal information:

- Identifiers
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Commercial information
- Internet or other similar network activity

#### **Share of Personal Information**

We may share Your personal information identified in the above categories with the following categories of third parties:

- Service Providers
- Payment processors
- Our affiliates
- Our business partners
- Third party vendors to whom You or Your agents authorize Us to disclose Your personal information in connection with products or services We provide to You

## Sale of Personal Information of Minors Under 16 Years of Age

We do not knowingly collect personal information from minors under the age of 16 through our Service, although certain third party websites that we link to may do so. These third-party websites have their own terms of use and privacy policies and we encourage parents and legal guardians to monitor their children's Internet usage and instruct their children to never provide information on other websites without their permission.

We do not sell the personal information of Consumers We actually know are less than 16 years of age, unless We receive affirmative authorization (the "right to opt-in") from either the Consumer who is between 13 and 16 years of age, or the parent or guardian of a Consumer less than 13 years of age. Consumers who opt-in to the sale of personal information may opt-out of future sales at any time. To exercise the right to opt-out, You (or Your authorized representative) may submit a request to Us by contacting Us.

If You have reason to believe that a child under the age of 13 (or 16) has provided Us with personal information, please contact Us with sufficient detail to enable Us to delete that information

## Your Rights under the CCPA

The CCPA provides California residents with specific rights regarding their personal information. If You are a resident of California, You have the following rights:

- The right to notice: You have the right to be notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.
- The right to request: Under CCPA, You have the right to request that We disclose information to You about Our collection, use, sale, disclosure for business purposes and share of personal information. Once We receive and confirm Your request, We will disclose to You:
  - The categories of personal information We collected about You
  - The categories of sources for the personal information We collected about You
  - Our business or commercial purpose for collecting or selling that personal information
  - The categories of third parties with whom We share that personal information
  - The specific pieces of personal information We collected about You

- If we sold Your personal information or disclosed Your personal information for a business purpose, We will disclose to You:
  - The categories of personal information categories sold
  - The categories of personal information categories disclosed
- The right to say no to the sale of Personal Data (opt-out): You have the right to direct Us to not sell Your personal information. To submit an opt-out request please contact Us.
- The right to delete Personal Data: You have the right to request the deletion of Your Personal Data, subject to certain exceptions. Once We receive and confirm Your request, We will delete (and direct Our Service Providers to delete) Your personal information from our records, unless an exception applies. We may deny Your deletion request if retaining the information is necessary for Us or Our Service Providers to:
  - Complete the transaction for which We collected the personal information, provide a good or service that You requested, take actions reasonably anticipated within the context of our ongoing business relationship with You, or otherwise perform our contract with You.
  - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
  - Debug products to identify and repair errors that impair existing intended functionality.
  - Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
  - Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
  - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if You previously provided informed consent.
  - Enable solely internal uses that are reasonably aligned with consumer expectations based on Your relationship with Us.
  - Comply with a legal obligation.
  - Make other internal and lawful uses of that information that are compatible with the context in which You provided it.
- The right not to be discriminated against: You have the right not to be discriminated against for exercising any of Your consumer's rights, including by:
  - Denying goods or services to You
  - Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
  - Providing a different level or quality of goods or services to You
  - Suggesting that You will receive a different price or rate for goods or services or a different level or quality of goods or services

# **Exercising Your CCPA Data Protection Rights**

In order to exercise any of Your rights under the CCPA, and if You are a California resident, You can contact the Company via the Contact information provided in this Policy.

Only You, or a person registered with the California Secretary of State that You authorize to act on Your behalf, may make a verifiable request related to Your personal information. Your request to Us must:

- Provide sufficient information that allows Us to reasonably verify You are the person about whom We collected personal information or an authorized representative
- Describe Your request with sufficient detail that allows Us to properly understand, evaluate, and respond to it

We cannot respond to Your request or provide You with the required information if we cannot:

- Verify Your identity or authority to make the request
- And confirm that the personal information relates to You
- We will disclose and deliver the required information free of charge within 45 days of receiving Your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

Any disclosures We provide will only cover the 12-month period preceding the verifiable request's receipt. For data portability requests, We will select a format to provide Your personal information that is readily usable and should allow You to transmit the information from one entity to another entity without hindrance.

#### Do Not Sell My Personal Information

You have the right to opt-out of the sale of Your personal information. Once We receive and confirm a verifiable consumer request from You, we will stop selling Your personal information. To exercise Your right to opt-out, please contact Us.

The Service Providers we partner with (for example, our analytics or advertising partners) may use technology on the Service that sells personal information as defined by the CCPA law. If you wish to opt out of the use of Your personal information for interest-based advertising purposes and these potential sales as defined under CCPA law, you may do so.

Please note that any opt out is specific to the browser You use. You may need to opt out on every browser that You use.

#### Website

You can opt out of receiving ads that are personalized as served by our Service Providers by following our instructions presented on the Service:

• The NAI's opt-out platform: <a href="http://www.networkadvertising.org/choices/">http://www.networkadvertising.org/choices/</a>

- The EDAA's opt-out platform <a href="http://www.youronlinechoices.com/">http://www.youronlinechoices.com/</a>
- The DAA's opt-out platform: <a href="http://optout.aboutads.info/?c=2&lang=EN">http://optout.aboutads.info/?c=2&lang=EN</a>

The opt out will place a cookie on Your computer that is unique to the browser You use to opt out. If you change browsers or delete the cookies saved by your browser, You will need to opt out again.

#### Mobile Devices

Your mobile device may give You the ability to opt out of the use of information about the apps You use in order to serve You ads that are targeted to Your interests:

- "Opt out of Interest-Based Ads" or "Opt out of Ads Personalization" on Android devices
- "Limit Ad Tracking" on iOS devices

You can also stop the collection of location information from Your mobile device by changing the preferences on Your mobile device.

# "Do Not Track" Policy as Required by California Online Privacy Protection Act (CalOPPA)

Our Service does not respond to Do Not Track signals. However, some third party websites do keep track of Your browsing activities. If You are visiting such websites, You can set Your preferences in Your web browser to inform websites that You do not want to be tracked. You can enable or disable DNT by visiting the preferences or settings page of Your web browser.

#### **Children's Privacy**

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

# Your California Privacy Rights (California's Shine the Light law)

Under California Civil Code Section 1798 (California's Shine the Light law), California residents with an established business relationship with us can request information once a year about sharing their Personal Data with third parties for the third parties' direct marketing purposes.

If you'd like to request more information under the California Shine the Light law, and if You are a California resident, You can contact Us using the contact information provided below.

# California Privacy Rights for Minor Users (California Business and Professions Code Section 22581)

California Business and Professions Code Section 22581 allows California residents under the age of 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted.

To request removal of such data, and if You are a California resident, You can contact Us using the contact information provided below, and include the email address associated with Your account.

Be aware that Your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

# **Appendix B: GDPR Policy Information**

## **Legal Basis for Processing Personal Data Under GDPR:**

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract. We may process Personal Data under the following conditions:

- Consent: You have given Your consent for processing Personal Data for one or more specific purposes.
- Performance of a contract: Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.
- Legal obligations: Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- Vital interests: Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.
- Public interests: Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.
- Legitimate interests: Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

## **Your Rights Under GDPR:**

The Company undertakes to respect the confidentiality of Your Personal Data and to guarantee You can exercise Your rights. You have the right under this Privacy Policy, and by law if You are within the EU, to:

- Request access to Your Personal Data. The right to access, update or delete the information We have on You. Whenever made possible, you can access, update or request deletion of Your Personal Data directly within Your account settings section. If you are unable to perform these actions yourself, please contact Us to assist You. This also enables You to receive a copy of the Personal Data We hold about You.
- Request correction of the Personal Data that We hold about You. You have the right to have any incomplete or inaccurate information We hold about You corrected.

- Object to processing of Your Personal Data. This right exists where We are relying on a legitimate interest as the legal basis for Our processing and there is something about Your particular situation, which makes You want to object to our processing of Your Personal Data on this ground. You also have the right to object where We are processing Your Personal Data for direct marketing purposes.
- Request erasure of Your Personal Data. You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.
- Request the transfer of Your Personal Data. We will provide to You, or to a third-party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which You initially provided consent for Us to use or where We used the information to perform a contract with You.
- Withdraw Your consent. You have the right to withdraw Your consent on using your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to certain specific functionalities of the Service.

You may exercise Your rights of access, rectification, cancellation and opposition by contacting the Company. Please note that we may ask You to verify Your identity before responding to such requests. If You make a request, the Company will try our best to respond to You as soon as possible.