

Ivar's Privacy Policy

Ivar's, Inc., K.V. Holdings, Inc., and their affiliates, subsidiaries, and related parties (collectively referred to as Ivar's) are committed to respecting your privacy. We use data and information we may from time to time collect from you to provide programs, offers, promotions, coupons, and other information about Ivar's products, restaurants, goods and services; to receive, process, and fulfill orders and to help provide a more useful and productive experience concerning our websites and services, goods, products, and those of our partners, affiliates, associates, and/or other contracting parties ("Associates").

This policy applies to www.Ivars.com, www.IvarsSoupalicious.com, and other Ivar's websites, links, pages, and related goods, products, and services (collectively, the "Site"). We may have additional or different terms and conditions on some of our websites, links, pages, and related goods, products, and services. Our Terms of Use located on the Site are also applicable to your use of the Site.

How We Use Collected Information:

If Ivar's offers you any services, coupons, programs, offers, or other proposals, we may require some or all of the following information from you: your full name, billing address, electronic mail address, month and day of birth (i.e., if you join our Carte Clam program for seniors), credit card number, credit card expiration date, and potentially additional information. Also, if you request, enroll in, register for, or otherwise express interest in information, goods, products, and/or services offered by Ivar's or by our Associates, you may be required to supply certain identifying and other information (e.g., name, password, email address, home address, goods, products, and services of interest). Information provided to us allows us and our Associates to offer and deliver personalized information, products, goods, services, programs, offers, coupons, and proposals to you and others based upon the information you provide.

You may be asked to complete surveys and other information requests while on the Site. These surveys and information requests help us to better understand how you and others are using the Site, and help us to create and offer better and different goods, products, and services for you and others. These surveys and information requests may be administered by Ivar's or by a third party.

Your provision of any information to Ivar's is referred to in this Privacy Policy as "Registering" or "Register". If you Register and approve, we may send you periodic communications (including electronic mail) from the Site, Ivar's, and/or our Associates, which may include special offers, promotions, coupons, programs, proposals, information, products, goods, and/or services related to the Site or Ivar's. Should you choose to "opt-out" of receiving particular electronic mail or other communications, you will no longer receive such communications. To unsubscribe from any of our communications or if you have any questions about our Site, or Ivar's goods, products or services, please request to be removed ([contact us](#)).

We may also track Site user traffic patterns, Registration information, order information, and other data to identify ways in which we can improve the Site and make it easier and better to use. We do not monitor what individual users read.

How We Protect Your Customer Information:

All customer data we collect is protected against unauthorized access although no information transmitted over, or accessible through, the internet can be guaranteed to be 100% secure. While Ivar's utilizes systems to protect personal information, Ivar's cannot guaranty that personal information will be completely secure from misappropriation due to inappropriate or unlawful activities, or due to the failure of computer hardware, computer software, or other equipment or systems beyond Ivar's reasonable control. If you have questions about security on the Site, please [contact us](#).

We Use Cookies to Speed the Process:

Cookies are small text files placed on your hard drive by a website when you visit. These files identify your computer and record your preferences and other data about your visit so that when you return to the site, the site knows who you are and can personalize your visit. In general, we may use cookies to collect information so that we can determine how to improve our sites by seeing which areas, features and products are most popular; to personalize the Site for you and make recommendations based on products you have liked in the past, as well as to improve the site experience. Most browsers automatically accept cookies as the default setting and you can modify the setting to reject cookies or to prompt you before accepting a cookie from the sites you visit by editing browser options. If you decide not to accept our cookies, you will still be able to access those parts of our Site available to the general public but you may not be able to use some of the Site's features or services and you may have a less satisfactory experience.

Disclosure to Others:

Ivar's does not sell, trade, lease, or otherwise transfer your personal information to others, except as outlined in this Privacy Policy and/or on the Site. We reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on us and/or concerning our Site. We may disclose any information collected from the Site in connection with any user's violation of posted Terms of Use for the Site or other contracts, agreements, or arrangements with Ivar's, to protect the property of Ivar's and its Associates, and the health, safety, and welfare of employees or representatives of Ivar's and its Associates, other users of the Site, or members of the public. Ivar's reserves the right to disclose and/or transfer personal information to a buyer or transferee of all or a portion of Ivar's assets. We may share non-personal, non-individual statistical or demographic information in aggregate form with our marketing partners, advertisers, or other third parties for research, sales, and/or other purposes, such as improving our Site, goods, products, and/or services. We do not, without your permission, share information about you or any specific individuals with third parties, except as outlined in this Privacy Policy and/or on the Site.

Please be aware that we provide links to third-party Web sites from the Site as a service to our guests and customers and we are not responsible for the content or information collection practices of those sites. Please also note that these Web sites' privacy policies will differ from those of Ivar's. Therefore, we encourage you to review and understand their privacy practices before providing them with information.

How to Change or Update Your Personal Information:

You may update or change your personal information pertaining to you or your account by contacting Ivar's and/or the Site ([contact us](#)). To request to be removed from our e-mail or other lists, or any of our communications, please contact us here ([contact us](#)).

Privacy Policy Updates:

We reserve the right to modify, delete, and/or replace this Privacy Policy at any time, so please review it frequently. If we decide to change our privacy policy, we will post those changes to this Privacy Policy available on the Site.

Ivar's Contact Information:

If you have any comments, concerns, questions, or suggestions regarding our Privacy Policy, please contact us electronically ([contact us](#)) or by submitting a question in writing to us at:

Ivar's, Inc.
1109 1st Ave Suite 350
Seattle, WA 98101
(206) 587-6500

Please include your name, mailing address, electronic mail address and property address along with your communication.

Your Consent with this Policy:

By using the Site, any service and/or information concerning this Site, and/or any related website, information, goods, products, and services, you signify your assent to this Privacy Policy or any other applicable Privacy Policy from time to time adopted by Ivar's. If you do not agree with the terms of this Privacy Policy, please do not use our Site.

CALIFORNIA PRIVACY NOTICE - IVAR'S

Ivar's customers and vendors that are located and/or doing business in California and others who may be subject to California law may refer to this California Privacy Notice ("California Notice") as a supplement to other privacy policies or notices issued by Ivar's, Inc. and its subsidiaries ("Ivar's"), and applies to "Consumers" as defined by the California Consumer Privacy Act (as amended by the California Privacy Rights Act, and together with related regulations, the "CCPA"). This California Notice describes how Ivar's may collect, use, or disclose information about you, your choices regarding our use of your information, how Ivar's make efforts to safeguard such information and how you may contact Ivar's regarding our privacy practices.

In the event of a conflict between any other Ivar's policy, statement, or notice and this California Notice, this California Notice will prevail as to California residents and rights they may have under California law.

As used herein, the term "Personal Information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is publicly available, de-identified, or aggregated. Unless otherwise stated, the disclosures that describe how and why we may collect and use your Personal Information also describe how and why we may have collected and used your Personal Information within the past twelve (12) months.

If you are a current employee of Ivar's, our California Employee Privacy Notice applies to the Personal Information we obtain about you in the employment context. You may contact Ivar's Human Resources to obtain a copy of the California Employee Privacy Notice that you received during onboarding.

How and Why We May Collect Your Personal Information

We may collect Personal Information about California consumers, including job applicants and individuals that interact with Ivar's in their capacity of representing another business, as set forth below. Note that the specific pieces of Personal Information we may collect about you may vary depending on the nature of your interactions with us and may not include all of the examples listed.

How and why we may collect your personal information

Category of Personal Information or Sensitive Personal Information	Examples of Personal or Sensitive Personal Information	Categories of Sources from which Collected	Purposes for Collection, Use or Disclosure
Identifiers	This includes name, mailing address, Internet Protocol address, e-mail address, telephone number, MAC address, company contact details (including company name, company address, company e-mail address, and company telephone number)	<ul style="list-style-type: none"> • Directly from you automatically when you use our Services • From our affiliates, subsidiaries, service providers, or business partners that help us to run our business, or from other individuals (e.g., when friends or family place a gift order) 	<ul style="list-style-type: none"> • To provide our products and services, including processing transactions • To communicate with you • To comply with applicable laws and regulations • To improve our products and services • To manage the quality, safety, and security of our products and services, including disclosures with regard to food safety • To detect and prevent fraud or illegal activity against you and/or us • To authenticate your identity • To review your qualifications and credentials • To determine if you might fit a job need of ours and to contact you to see if you might be interested in a job for which you did not apply • To deliver legal or other notices • To assess your job application,

How and why we may collect your personal information

Category of Personal Information or Sensitive Personal Information	Examples of Personal or Sensitive Personal Information	Categories of Sources from which Collected	Purposes for Collection, Use or Disclosure
			<p>including to manage your profile in our recruitment system, perform pre-screening checks, send transactional SMS messages about the status of your application, and conduct interviews</p> <ul style="list-style-type: none"> • To enter into and execute agreements
<p>Personal Information described in Cal. Civ. Code Sec 1798.80</p>	<p>This includes Identifiers listed above, tokenized instances of payment card details, signature, telephone number, employment and employment history, education, physical and electronic signature, and company financial information (such as routing numbers, etc.)</p>	<ul style="list-style-type: none"> • Directly from you • automatically when you use our Services • From our affiliates, subsidiaries, service providers, or business partners that help us to run our business, or from other individuals (e.g., when friends or family place a gift order) 	<ul style="list-style-type: none"> • To provide our products and services, including processing transactions • To communicate with you • To comply with applicable laws and regulations • To improve our products and services • To manage the quality, safety, and security of our products and services, including disclosures with regard to food safety • To detect and prevent fraud or illegal activity against you and/or us

How and why we may collect your personal information

Category of Personal Information or Sensitive Personal Information	Examples of Personal or Sensitive Personal Information	Categories of Sources from which Collected	Purposes for Collection, Use or Disclosure
			<ul style="list-style-type: none"> • To authenticate your identity • To review your qualifications and credentials • To determine if you might fit a job need of ours and to contact you to see if you might be interested in a job for which you did not apply • To respond to chats with our virtual job assistant • To deliver legal or other notices • To assess your job application, including to manage your profile in our recruitment system, perform pre-screening checks, send transactional SMS messages about the status of your application, and conduct interviews • To enter into and execute agreements
<p>Characteristics of some protected classifications</p>	<p>Under California or federal law, this includes age and date of birth, marital status, race, ancestry, ethnic origin, sex, gender, sexual orientation, gender</p>	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • To comply with U.S. Equal Employment Opportunity Commission (“EEOC”) and California Civil

How and why we may collect your personal information

Category of Personal Information or Sensitive Personal Information	Examples of Personal or Sensitive Personal Information	Categories of Sources from which Collected	Purposes for Collection, Use or Disclosure
	identity, religion or creed, military or veteran status, medical condition, or disability		Rights Agency (“CCRA”) requirements, and other equal opportunity initiatives <ul style="list-style-type: none"> • To support our recruitment and diversity, equity, and inclusion programs and initiatives
Commercial Information / Purchase Details	Such as purchase history or tendencies	<ul style="list-style-type: none"> • Directly from you • automatically when you use our Services • From our affiliates, subsidiaries, service providers, and business partners that help us to run our business 	<ul style="list-style-type: none"> • To provide our products and services • To improve our products and Services • To reimburse you if you travel for a job interview and seek reimbursement
Internet or other electronic network activity information	This includes browsing history, information regarding interactions with our services or advertisements	<ul style="list-style-type: none"> • Automatically when you use our Services • From our affiliates, subsidiaries, service providers, and business partners that help us to run our business 	<ul style="list-style-type: none"> • To provide our products and services • To process and manage interactions and transactions for our products and Services • To improve our products and Services • To manage the security of our Services

How and why we may collect your personal information

Category of Personal Information or Sensitive Personal Information	Examples of Personal or Sensitive Personal Information	Categories of Sources from which Collected	Purposes for Collection, Use or Disclosure
			<ul style="list-style-type: none"> To detect and prevent fraud or illegal activity
Geographic Location Data	This includes precise physical location	<ul style="list-style-type: none"> Automatically when you use our Services 	<ul style="list-style-type: none"> To show you relevant offers and promotions To determine which restaurant is closest to you To ensure you place your order from the right restaurant To improve our Services, set default options, and provide you with a better shopping experience
Audio, electronic, visual or similar information	This includes Audio recordings of customer service calls, CCTV footage	<ul style="list-style-type: none"> Automatically while you are on our property or using certain Services From our affiliates, subsidiaries, service providers, and business partners that help us to run our business 	<ul style="list-style-type: none"> To improve our products and Services To manage the security of our services and facilities To detect and prevent fraud or illegal activity against you and/or us
Professional or employment-related information	This includes recruitment information (such as skills, qualifications, references, recommendations,	<ul style="list-style-type: none"> Directly from you 	<ul style="list-style-type: none"> To review your qualifications and credentials To contact references and

How and why we may collect your personal information

Category of Personal Information or Sensitive Personal Information	Examples of Personal or Sensitive Personal Information	Categories of Sources from which Collected	Purposes for Collection, Use or Disclosure
	<p>languages spoken, and other information included in a resume, application form, or cover letter)</p>		<p>conduct background checks</p> <ul style="list-style-type: none"> • To determine if you might fit a job need of ours and to contact you to see if you might be interested in a job for which you did not apply • To assess your job application, including to manage your profile in our recruitment system, perform pre-screening checks, send transactional SMS messages about the status of your application, and conduct interviews • To administer your business account
<p>Inferences we may draw</p>	<p>This is used to create a profile reflecting your restaurant preferences, dining preferences, customer characteristics, and behavior</p>	<ul style="list-style-type: none"> • Drawn from the other categories of Personal Information we collect 	<ul style="list-style-type: none"> • To manage the security of our Services • To show you relevant ads while you are browsing the internet or using social media • To improve our Services, set default options, and provide you with a better dining experience

How and why we may collect your personal information			
Category of Personal Information or Sensitive Personal Information	Examples of Personal or Sensitive Personal Information	Categories of Sources from which Collected	Purposes for Collection, Use or Disclosure
			<ul style="list-style-type: none"> • To inform you about other positions you may be interested in • To determine if you might fit a job need of ours • To detect and prevent fraud or illegal activity against you and/or us

Additional information collected from job applicants.

We may collect your Personal Information if you apply to work for us or otherwise participate in the Ivar’s recruitment process. This Personal Information may include information relating to your eligibility to work in your jurisdiction (such as immigration and/or visa status), and criminal records information obtained through background checks. Your Personal Information may be submitted through or processed by our service providers, who share your information with us. For example, if you choose to import Personal Information about yourself from other websites or use a chatbot to ask recruitment-related queries, send communications, or schedule interviews, your information may be processed by one or more of our service providers. We may also collect Personal Information from our service providers, including via referrals, recruitment agencies, and background screening providers.

Disclosures for business purposes.

We may disclose Personal Information to our subsidiaries, affiliates, service providers, and contractors for business purposes as follows:

- To process your transactions or requests for products or services
- To perform services on our behalf (such as fulfilling orders, processing payments, supporting promotions, communicating, tech support)
- To ensure security and integrity of Personal Information
- To debug or identify and repair technical errors that impair existing intended functionality
- For short-term use, including, but not limited to, non-personalized advertising
- For advertising and marketing purposes, including auditing related to ad impressions

- In connection with activities to verify or maintain the quality or safety of our products and services
- To comply with applicable legal requirements, including disclosures concerning food safety and related health issues
- To detect or protect against malicious, deceptive, fraudulent, or illegal activity

Although we do not sell Personal Information in exchange for money, some of the ways in which we disclose Personal Information for targeted advertising purposes may be considered “sales” or “sharing” under California law (where selling may include disclosure of some Personal Information to third parties under circumstances where the third parties may use the information for their own purposes). You may opt out of this type of selling and/or sharing of your Personal Information by contacting us ([contact us](#)).

We do not plan or propose, nor do we have actual knowledge that we sell or share the Personal Information of consumers under the age of 16.

How Long We Keep Your Personal Information

We may keep the categories of Personal Information described above for as long as is necessary for the purposes described in this California Notice or otherwise required or permitted by law. This generally means holding the information for as long as one of the following apply:

- Your Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information;
- Your Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected;
- Your Personal Information is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your information by applicable laws or regulations.

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please contact us using the contact details below.

California Privacy Rights

California residents have certain rights that they may exercise independently or through an authorized agent. California rights requests are subject to an identification and verification process. We will not fulfill a CCPA request unless we have been provided sufficient information for us to reasonably verify that the requestor is the consumer about whom we have collected Personal Information.

In order to verify your identity, we may ask you to contact us from the e-mail address or phone number associated with your request. Depending on the nature of your request, we may also ask you to provide 2-3 pieces of Personal Information that we will match against our records to confirm your identity. Please follow the instructions in any correspondence regarding your

request, and promptly respond to any follow-up inquiries. If you have requested that we provide you with specific pieces of Personal Information which Ivar's has about you, we will apply heightened verification standards.

An authorized agent may submit a request on behalf of a consumer if the consumer has provided the authorized agent with power of attorney in accordance with California law; alternatively, we will (1) require the authorized agent to present verifiable written authorization from the consumer that the authorized agent has the consumer's permission to submit the request; and (2) independently verify the consumer's own identity with us.

If we cannot comply with a request, we will explain the reasons in our response. You are not required to create an account with us to make a verifiable request, but you may use your account to do so. We will use Personal Information provided in your request only to verify your identity or authority to make the request and to track and document request responses unless you also provided the Personal Information to us for another purpose.

Your California privacy rights are described below. You or an authorized agent may make a request by calling us (206) 587-6500.

Right To Know.

You have the right to request that we disclose the following information about your Personal Information that we have collected about you. Consumer requests of this nature may be made no more than twice in a 12-month period.

- The categories of Personal Information we have collected about you
- The categories of sources from which we collected your Personal Information
- The business or commercial purposes for collecting, selling, or sharing your Personal Information
- The categories of recipients to whom we have disclosed your Personal Information
- The specific pieces of Personal Information we have collected about you
- A list of the categories of Personal Information disclosed for a business purpose in the prior 12 months
- A list of the categories of Personal Information about you that was sold or shared in the prior 12 months, if any. If we sold your Personal Information, we will also list the categories of third parties to which we sold Personal Information, by categories of Personal Information sold for each third party

Right to Delete.

Except where we have a basis for retention under CCPA, you may request that we delete your Personal Information that we have collected directly from you and are maintaining.

Right to Correct Inaccurate Information.

If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.

Right to Opt Out of the Sale or Sharing of Personal Information.

You have the right to opt out of the “sale” or “sharing” of your Personal Information and you may do so by contacting us ([contact us](#)) to indicate your opt out preferences. For more information on how we use cookies and other tracking technologies, please review our Privacy Policy.

Right to Non-Discrimination.

We will not discriminate against you because you exercise your California privacy rights. This means that, consistent with California law, we will not deny providing our products or services to you, charge you different prices, or provide a different level or quality of products or services to you.

California’s “Shine the Light” Law

California’s “Shine the Light” law permits California customers to request certain information regarding our disclosure of Personal Information to third parties for those third parties’ own direct marketing purposes. We do not share customer Personal Information with third parties for their direct marketing purposes without giving you the ability to opt out. If you are a California resident, you may request information about our compliance with the Shine the Light law by contacting us at (206) 587-6500.

Contact Information

For more information regarding this California Notice or your California privacy rights, you may contact us (206) 587-6500 or email us at ____@keepclam.com. You may also write to us at:

Ivar’s, Inc
1109 1st Ave Suite 350
Seattle, WA 98101

Effective Date: August 1 2023

Further information for Colorado consumers

This section is intended to integrate and supplement the information contained in the rest of our Privacy Policy and applies to all users who are consumers residing in the State of Colorado, according to the "Colorado Privacy Act" (the "CPA"), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the Privacy Policy.

This part of the document uses the term "personal data" as defined in the CPA.

Categories of personal data processed

In this section, we summarize the categories of personal data that we may process and the purposes thereof. You can read about these activities in detail in the section titled "Detailed information on the processing of Personal Data" within this document.

Categories of personal data we collect

We may collect the following categories of personal data: identifiers, commercial information and internet information; we do not collect sensitive data; we will not collect additional categories of personal data without notifying you.

Why we process your personal data

To find out why we may process your personal data, you can read the sections titled "Detailed information on the processing of Personal Data" and "The purposes of processing" within this document.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent. You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

How we use the data we collect: sharing of your personal data with third parties

We may share your personal data with the third parties listed in detail in the section titled "Detailed information on the processing of Personal Data" within this document. These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person, public authority, agency, or body other than a consumer, controller, processor, or affiliate of the processor or the controller." as defined by the CPA.

Sale of your personal data

As specified in the "Detailed information on the processing of Personal Data" section of this document, our use of your personal data may be considered a sale under the CPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the CPA.

Please note that according to the CPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the CPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

Your right to opt out of the sale of your personal data and how you can exercise it

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request. To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document. We may use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

Processing of your personal data for targeted advertising

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes. For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by CPA. Please note that according to the CPA, targeted advertising does not include: “advertisements directed to a consumer in response to the consumer's request for information or feedback; advertisements based on activities within a controller's own websites or online applications or any affiliated website or online application; advertisements based on the context of a consumer's current search query, visit to an internet web site or online application; or processing personal data solely to measure or report advertising frequency, performance or reach”.

Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request. To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document. We may use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

Your privacy rights under the Colorado Privacy Act and how to exercise them

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following: opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you; access personal data: you have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data; correct inaccurate personal data: you have the right to request that we correct any inaccurate personal data we may maintain about you, taking into

account the nature of the personal data and the purposes of the processing of the personal data; request the deletion of your personal data: you have the right to request that we delete any of your personal data; obtain a copy of your personal data: we will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

How to exercise your rights

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document. For us to respond to your request, we need to know who you are and which right you wish to exercise. We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request. Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes. If you are an adult, you can make a request on behalf of a child under your parental authority.

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request. Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 45 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may contact the Colorado Attorney General to submit a complaint.

We do not charge a fee to respond to your request, for up to two requests per year.

Further information for Utah consumers

This section of our Privacy Policy integrates with and supplements the information contained in the rest of our Privacy Policy and applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Utah, according to the “Consumer Privacy Act” (the “UCPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the UCPA.

Categories of personal data processed

In this section, we summarize the categories of personal data that we may process and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.**

Categories of personal data we collect

We may collect the following categories of personal data: identifiers, commercial information and internet information; we do not collect sensitive data. We will not collect additional categories of personal data without notifying you.

Why we process your personal data

To find out why we may process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

How we use the data we collect: sharing of your personal data with third parties

We may share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person other than: the consumer, controller, or processor; or an affiliate or contractor of the controller or the processor" as defined by the UCPA.

Sale of your personal data

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the UCPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the UCPA.

Please note that according to the UCPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other

specific exceptions set forth in the UCPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

Your right to opt out of the sale of your personal data and how you can exercise it

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request. To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document. For a simplified opt-out method you can also use the contact information provided on this Website. We may use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

Processing of your personal data for targeted advertising

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes. For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by UCPA. Please note that according to the UCPA, targeted advertising does not include: “advertisements based on activities within a controller's own websites or online applications or any affiliated website or online application; advertisements based on the context of a consumer's current search query, visit to a web site or online application; advertisements directed to a consumer in response to the consumer's request for information, product, a service or feedback; or processing personal data solely to measure or report advertising performance, reach or frequency.”

Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request. To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document. We may use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

Your privacy rights under the Utah Consumer Privacy Act and how to exercise them

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following: access personal data; you have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data; request the deletion of your personal data: you have the right to request that we delete any of your personal data; obtain a copy of your personal data: we will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible; opt out of the processing of your personal data for the purposes of targeted advertising or the sale of personal data.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

How to exercise your rights

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document. For us to respond to your request, we need to know who you are and which right you wish to exercise. We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request. We may retain your email address to respond to your request. If you are an adult, you can make a request on behalf of a child under your parental authority.

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request. Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. We do not charge a fee to respond to your request, for up to one request per year.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Website or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this Privacy Policy, this Website may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Website and any third-party services may collect files that record interaction with this Website (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to our Privacy Policy

We reserve the right to make changes to our Privacy Policy at any time by notifying the Users on this page and possibly within this Website and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the us. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, we shall collect new consent from the User, where required.