

PRIVACY NOTICE

Last Updated: September 08, 2023

- **Overview**
- **Applicability of HIPAA and GLBA**
- **Personal Information We Collect / Sources of Personal Information**
- **Use of Personal Information**
- **Disclosing Personal Information**
- **Cookie Policy**
- **Children Under the Age of 16**
- **Your State Privacy Rights**
- **Retention of Data**
- **Data Security**
- **Third-Party Applications and Integrations**
- **Updates to This Privacy Notice**
- **Contact Information**

OVERVIEW

This Privacy Notice describes the information collection, use, and disclosure practices with respect to [Polcyn Insurance and Financial Services, LLC] (“we,” “us,” “our,” or the “Company”) and its website, [<https://www.polcynfinancial.com/>], and any other websites or platforms that the Company may create in the future (the “Platform”).

The purpose of the Platform is to provide information and tools to licensed insurance agents and prospective insurance agents (“Agents”). We also receive information about individuals who are interested in insurance or financial products (“Consumers”) and make such information available to licensed insurance agents who assist individuals with the purchase of the products. We may also work with “Lead Vendors” – companies that collect inquiries from Consumers and pass such inquiries to Agents and Company representatives. Lead Vendors must obtain appropriate consent from Consumers to be contacted regarding specific products before providing us with such Consumers’ information.

This Privacy Notice uses the term “Personal Information” to describe information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

APPLICABILITY OF HIPAA AND GLBA

Since we facilitate the sale of a diverse range of insurance products, our processing of some information on behalf of our agents may fall under another state or federal regulatory framework, like the Health Insurance Portability and Accountability Act (“HIPAA”) and related state laws, or the Gramm-Leach-Bliley Act (“GLBA”) and related state laws.

Specifically, we act as a Business Associate (as defined by HIPAA) if we receive client Protected Health Information (“PHI”) from lead vendors or on behalf of a health plan that is a Covered Entity (as defined by HIPAA). In our role as a Business Associate we collect, use, and disclose PHI to provide services for or on behalf of health plans. For more information about how PHI is used and disclosed, please review the applicable health plan’s Notice of Privacy Practices.

When we receive client information pertaining to certain insurance or financial products, we may collect non-public personal financial information, which is regulated by GLBA. For more information about how non-public personal financial information is used and disclosed, please review the GLBA Notice provided by the financial institution that issued the clients’ policies or products.

This Privacy Notice applies to personal information that is not covered by HIPAA or GLBA.

PERSONAL INFORMATION WE COLLECT / SOURCES OF PERSONAL INFORMATION

The table below details the categories of Personal Information that we may collect or obtain through the operation of the Platform. In addition to the sources listed below, we may collect this information from third-party service providers or vendors, including data analytics providers.

CATEGORY	EXAMPLES AND SOURCES
Contact Information	<p>Consumers' and Agents' name, phone number, and email address, as well as Consumers' postal address.</p> <p>We may collect this information about Consumers from Lead Vendors, Agents, insurance carriers, data brokers, and agencies.</p> <p>We collect this information about Agents from Agents or marketing organizations in the Agents' product sale hierarchy.</p>
Login Credentials	<p>This includes username and password* when Agents or Consumers choose to create an account with us.</p>
Identification Information*	<p>Agents' National Producer Number and Social Security number.</p> <p>We collect this information from Agents when they begin working with us.</p> <p>Consumers' driver's license, Social Security, and/or similar government-issued identification numbers.</p> <p>We collect this information about Consumers provided in the course of discussions with an Agent or representative, which is relevant to the processing of an application for an insurance or financial product.</p>
Demographic Information*	<p>Consumers' age, date of birth, marital status, language preference, ethnicity, race, and sex or gender.</p> <p>We collect this information about Consumers when Lead Vendors, insurance carriers, Agents, data brokers, or agencies provide it to us.</p>
Health Information*	<p>Consumers' health information provided in the course of discussions with an Agent or representative, which is relevant to the processing of an application for an insurance or financial product. For example, notes about a Consumer may state that the Consumer has diabetes, as is relevant for an application for a life insurance product.</p>
Sensory Information	<p>Audio recordings of Consumer conversations with representatives and Agents in connection with inquiries regarding insurance and/or financial products. We may also have access to video snippets of user website activity evidencing consent to be contacted. This information is collected from Lead Vendors, Agents, insurance carriers, and agencies.</p>
Commercial Information	<p>We collect information about the products requested by Consumers, including information entered into insurance and/or financial product applications, as provided by you, a Lead Vendor, Agent, data brokers, insurance carriers, advertising and/or social media networks, or an agency. We also collect information regarding your</p>

	purchase of insurance and/or financial products, including the type of product purchased and the corresponding carrier.
Internet or Other Similar Network Activity	Automatically collected information on users' interaction with the Platform. This may include your browsing history (including the site you came from before visiting our website and the site you went to after leaving our website), duration of browsing session, device ID, and IP address. We may also collect this information from advertising networks.
Geolocation Data	We collect geolocation, which may include precise geolocation,* from users. We automatically collect this information from you and may also collect this from advertising networks.
Educational and Professional Information	We collect from data brokers Personal Information about Consumers' educational background, profession, income, product preference, consumer behavior, and asset ownership. This information is used for offline marketing. We also collect this information from Agents when they begin working with us.

Some or all of the types of Personal Information marked with an asterisk (*) may be considered "sensitive" personal information according to some state laws.

We may also partner with financial processors or payment vendors to provide services to Agents on the Platform.

We do not collect biometric information.

Your information may be provided to us by your spouse or other family member.

HOW WE USE THE PERSONAL INFORMATION WE COLLECT

We may use or disclose the Personal Information that we collect for one or more of the following purposes:

- Operate the Platform;
- Communicate with you regarding the Platform;
- Contact Consumers through our employed agents regarding insurance and/or financial products in which the Consumer expressed interest;
- Address users' and Consumers' inquiries;
- Process transactions;
- Tailor the content and information that we may send or display to you;
- Analyze use of our products and services;
- Develop new products and services;
- Comply with legal obligations;
- Protect our rights, property, and safety or the rights, property, and safety of others; and
- Evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our customers is among the assets transferred. You hereby consent to such transfers and we may assign and transfer all of the rights, benefits, duties, and obligations of this Privacy Notice, under the circumstances described in this paragraph.

From time to time, we may contact users via email and mail, for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication. If you would like to stop receiving marketing or promotional communications via email or mail from us, you may opt-out of such communications by contacting us at the toll-free number or email address listed below.

We may also contact Agents, Consumers, and other users via text messaging, but only if such individuals opt-in to receive text messages and only within the scope of such consent.

HOW WE SHARE THE PERSONAL INFORMATION WE COLLECT

We may disclose all categories of Personal Information described above in “Personal Information We Collect” to the third parties listed below for the purpose of facilitating the sale of insurance and/or financial products to individuals who are interested in purchasing such products.

- **With Our Service Providers.** We may share Personal Information about Consumers and Agents with third parties who perform services for us or on our behalf. For example, this may include payment processors and companies that send emails on our behalf or other operating systems or platforms that help us run our services.
- **With Our Business Partners.** This includes our affiliates in the insurance or financial industry, insurance carriers, and any other entities that are involved in the sale of insurance or financial products such as marketing organizations that specialize in the insurance or financial industry.
- **With Law Enforcement, Government Agencies, or Parties to a Legal Proceeding.** We may share Personal Information with such entities to comply with the law or assist in law enforcement.
- **With Our Independent Agents and Advisors.** Agents and advisors have access to the Personal Information about Consumers that is provided by the Consumers when requesting information regarding insurance and/or financial products.
- **With Data Analytics Providers and Advertising Service Providers.** Third-party data analytics providers may collect Personal Information about users over time and across different websites, applications, and devices for the purposes of targeted advertising. These providers may collect Personal Information, specifically Internet or other similar network activity information, your input on the website, social media information, and/or commercial information in this manner on our Platform. For more information on these third parties, please see the below “Cookie Policy.”

We may partner with these third parties to tailor and customize our advertising to Users. The practice of targeted advertising may be considered a “sale” of Personal Information under some state laws. For more information about your choices related to this practice, please see “Your State Privacy Rights” below.

COOKIE POLICY

The website on which the Platform is hosted may use cookies, pixel tags, web beacons, and similar technologies to track and enhance user experience, including technologies placed on the website by third parties, such as advertising network partners. Users’ web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. Cookies can also enable us to track and target the interests of our users to enhance their experience on our website. We may use the following types of cookies: advertising and analytics and social media.

You may choose to set your web browser to refuse cookies or to alert you when cookies are being sent. If you do so, some parts of the Platform may not function properly. Our Platform does not recognize “Do

Not Track” signals, but it may recognize other opt-out preference signals, such as the Global Privacy Control (GPC). You may set such a signal through your browser or browser extension.

CHILDREN UNDER THE AGE OF 16

The Platform is not intended for children under 16 years of age. We do not collect information about individuals under the age of 16. No one under age 16 may provide any information through the Platform. We do not knowingly collect Personal Information from children under 16, and we do not have actual knowledge that we sell or share the Personal Information of children under 16. If you are under 16, do not use or provide any information through the Platform. If we learn we have collected or received Personal Information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us.

YOUR STATE PRIVACY RIGHTS

State consumer privacy laws may provide their residents with additional rights regarding our use of their Personal Information as described in more detail below.

To exercise any of these rights, please click [here](#).

To appeal a decision regarding a consumer rights request, please fill out [this](#) form and include “APPEAL” in your request details, along with a short description of your prior request and the outcome that you are seeking. We may request more information in order to locate your prior request.

Please see below for links to our state-specific privacy notice:

- [Your Privacy Rights – California](#)
- [Your Privacy Rights – Colorado](#)
- [Your Privacy Rights – Connecticut](#)
- [Your Privacy Rights – Nevada](#)
- [Your Privacy Rights – Utah](#)
- [Your Privacy Rights – Virginia](#)

Sale and Sharing of Personal Information

We facilitate the sale of insurance and financial products, and may engage in targeted advertising, which may be considered "selling" or "sharing" personal information as defined under certain state privacy laws, including California. In the last twelve (12) months, we have "sold" or "shared" the categories of personal information identified in "PERSONAL INFORMATION WE COLLECT" with advertising networks, data analytics vendors, insurance carriers, and Agents.

RETENTION OF DATA

We retain Personal Information where we have an ongoing legitimate business or legal need to do so. Our retention periods will vary depending on the type of data involved, but, generally, we refer to these criteria in order to determine retention period:

- Whether we have a legal or contractual need to retain the data;
- Whether the data is necessary to provide our Platform; and
- Whether our Consumers or Agents would reasonably expect that we would retain the data until they remove it or until their accounts are closed or terminated.

When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been

stored in backup archives), then we will securely store your Personal Information and cease any further processing until deletion is possible.

DATA SECURITY

No security is foolproof, and the Internet is an insecure medium. We cannot guarantee absolute security, but we work hard to protect our Company and you from unauthorized access to or unauthorized alteration, disclosure, or destruction of Personal Information that we collect and store.

THIRD-PARTY APPLICATIONS AND INTEGRATIONS

Our Platform uses third-party applications and integrations to enhance its experience. We disclaim any and all liability and responsibility for the use of these applications and integrations, and encourage you to review their individual privacy policies before using our Platform or otherwise engaging with us. We disclaim any and all liability and responsibility for the use of these applications and integrations and encourage you to review any individual privacy notice related to those applications and integrations.

UPDATES TO THIS PRIVACY NOTICE

We may revise this Privacy Notice from time to time. If we make material changes to this Privacy Notice, we will notify you by email or by posting a notice on our Platform prior to or on the effective date of the changes. By continuing to access or use the Platform after those changes become effective, you acknowledge the revised Privacy Notice.

CONTACT INFORMATION

If you have any questions or comments about this notice, or the ways in which we collect and use your personal information, please do not hesitate to contact us at:

Phone: [480-369-1008](tel:480-369-1008)

Email: compliance@polcynfinancial.com

Address: 4980 S Alma School Road, Suite A2-616, Chandler Arizona, 85248

YOUR PRIVACY RIGHTS – CALIFORNIA

To the extent the law applies to Company, Company is required under the California Consumer Privacy Act (“CCPA”), as amended, to provide certain information to California residents about how we collect, use, and share their Personal Information in our capacity as a business, and about the rights and choices California residents may have concerning their Personal Information. For purposes of this section, “Personal Information” has the meaning provided in the CCPA.

This section applies only to California residents. As a California resident, you have the rights listed below. However, these rights are not absolute, and, in certain cases, we may decline your request as permitted by law. To exercise any of these rights, please click [here](#). Only you, or someone legally authorized to act on your behalf, may make a request related to your Personal Information.

The following disclosures are made in compliance with the CCPA, as amended. In the past twelve (12) months, we have collected the Personal Information described above, and disclosed it to the third parties listed under the section “Sharing Personal Information” for the business purposes identified therein and under the section “Use of Personal Information.” This information falls into the following categories of Personal Information under the CCPA:

- Identifiers;
- Categories of Personal Information described in section 1798.80(e) of the California Civil Code;
- Characteristics of protected classifications under California or federal law;
- Commercial information;
- Geolocation information;
- Audio, electronic, or visual information;
- Internet or electronic network activity information;
- Professional or employment-related information; and
- Sensitive personal information identified by asterisk (*) in the above table.

As disclosed above in “Sale and Sharing of Personal Information” we may engage in activity that may be considered “selling” or “sharing” Personal Information. If you wish to opt-out of this use of your Personal Information, click here: [Do Not Sell or Share My Personal Information](#).

We do not use or disclose sensitive Personal Information (indicated in the section “Personal Information We Collect” with an asterisk (*)) for purposes other than those specified in Cal. Code Regs. tit. 11, § 7027(m).

Below is a summary of your rights under the CCPA. Please note that these rights are not absolute, and, in certain cases, we may decline your request as permitted by law.

Consumer Right	Description
----------------	-------------

<p>Access</p>	<p>You may request that we provide the following information about how we have collected and used your Personal Information:</p> <ul style="list-style-type: none"> • The categories of Personal Information we have collected about you; • The sources from which that Personal Information was collected; • The business or commercial purpose for collecting, selling, and/or sharing your Personal Information; • The categories of Personal Information we shared or sold about you; • The categories of third parties to whom we shared or sold Personal Information about you; • The categories of Personal Information we disclosed for a business purpose; and • The categories of third parties to whom we disclosed Personal Information about you for a business purpose.
<p>Request a Copy of Your Personal Information</p>	<p>You may request a copy of your Personal Information.</p> <p>You may submit a request that Company disclose the categories and specific pieces of Personal Information that we have collected, used, or disclosed about you.</p> <p>Please note that simply because Company has provided the categories of Personal Information it may collect pursuant to California law does not mean Company necessarily collected all of the specific pieces of Personal Information listed for any given person. Also, please note where Personal Information was disclosed within the past twelve (12) months, it may have been disclosed only to service providers.</p>
<p>Correction</p>	<p>You may request to edit or correct your Personal Information at any time.</p>
<p>Deletion</p>	<p>You may have the right, under certain circumstances, to request that we delete the Personal Information you have provided to us.</p>
<p>Opt-Out of Sales and/or Sharing</p>	<p>The CCPA may classify our use of some services as “selling” or “sharing” your Personal Information with the partners that provide the services. You can opt-out of the “selling” and/or “sharing” of your Personal Information.</p>
<p>Limit Processing of Sensitive Personal Information</p>	<p>We use sensitive Personal Information only as necessary for our (1) Service delivery and operations, (2) compliance and protection, (3) quality control and improvements, or (4) Service improvement and analytics purposes in accordance with CCPA. If we use sensitive Personal Information outside the permitted purposes of CCPA, you have the right to limit such processing of sensitive Personal Information.</p>

Exercising Your Privacy Rights

Process	Description
---------	-------------

Verification	<p>In order to protect your Personal Information from unauthorized access or deletion, we may require you to verify your account credentials before you can submit a rights request. If you do not have an account with us, or if we suspect your account has been accessed without your authorization, we may ask you to provide additional Personal Information for verification.</p> <p>Company is legally obligated to verify your identity when you submit a request. We may request additional information from you to verify your identity. If you submit a request to delete your Personal Information, you will also be required to confirm the deletion request by email.</p> <p>If we are subsequently unable to confirm your identity, we may refuse your rights request.</p>
Use of Authorized Agents	<p>You may use an authorized agent to submit a rights request. If you do so, the authorized agent must present signed written authorization to act on your behalf, and you will also be required to independently verify your own identity directly with us and confirm with us that you provided the authorized agent permission to submit the rights request. This verification process is not necessary if your authorized agent provides documentation showing that the authorized agent has power of attorney to act on your behalf under Cal. Prob. Code §§ 4121 to 4130.</p>

YOUR PRIVACY RIGHTS – COLORADO

To the extent the law applies to Company, Company is required under the Colorado Privacy Act (“CPA”) to provide certain information to Colorado residents about how we collect, use, and share their Personal Data in our capacity as a business, and about the rights and choices Colorado residents may have concerning their Personal Data. For purposes of this section, “Personal Data” has the meaning provided in the CPA and does not include information exempted from the scope of the CPA. Please note that we may claim legal exemptions for certain types of Personal Data and from certain parts of the CPA.

This section applies only to Colorado residents. As a Colorado resident, you have the rights listed below. However, these rights are not absolute, and, in certain cases, we may decline your request as permitted by law.

To exercise any of these rights, please click [here](#).

Consumer Right	Description
Confirm, Access, and Data Portability	You may request that we confirm whether we are processing your Personal Data. You may also request a copy of your Personal Data in a portable and readily-usable format.
Correction	You may request to edit or correct your Personal Data at any time.
Deletion	You may have the right, under certain circumstances, to request that we delete the Personal Data you have provided to us.
Opt-Out of Tracking for Targeted Advertising Purposes	You can submit requests to opt-out of tracking for targeted advertising purposes.
Opt-Out of Profiling	You can opt-out of the automated processing of your Personal Data to evaluate, analyze, or predict personal aspects related to your economic situation, health, personal preferences, interests, reliability, behavior, location, or movements, to the extent this results in decisions that produce legal or similarly significant effects.
Opt-Out of Sales	The CPA may classify our use of some services as “selling” your Personal Data with the partners that provide the services. You may submit a request to opt-out of “selling” of your Personal Data.
Sensitive Personal Data	We will not process your sensitive Personal Data without your consent.

Non-Discrimination	You have the right to be free from discrimination related to your exercise of any of your Colorado privacy rights.
---------------------------	--

Exercising Your Privacy Rights

Process	Description
Authentication	<p>In order to protect your Personal Data from unauthorized access or deletion, we may require you to verify your account credentials before you can submit a rights request. If you do not have an account with us, or if we suspect that your account has been accessed without your authorization, we may ask you to provide additional Personal Data for verification.</p> <p>We are legally obligated to verify your identity when you submit a request. We may request additional information from you to verify your identity. If you submit a request to delete your Personal Data, you will also be required to confirm the deletion request by email.</p> <p>If we are subsequently unable to confirm your identity, we may refuse your rights request.</p>
Use of Authorized Agents (Only Permitted for Opt-Out Requests)	You may use an authorized agent to submit a rights request. If you do so, the authorized agent must present signed written authorization to act on your behalf, and you will also be required to independently verify your own identity directly with us and confirm with us that you provided the authorized agent permission to submit the rights request.

YOUR PRIVACY RIGHTS – CONNECTICUT

To the extent the law applies to Company, Company is required under the Connecticut Data Privacy Act (“CTDPA”) to provide certain information to Connecticut residents about how we collect, use, and share their Personal Data in our capacity as a business, and about the rights and choices Connecticut residents may have concerning their Personal Data. For purposes of this section, “Personal Data” has the meaning provided in the CTDPA and does not include information exempted from the scope of the CTDPA. Please note that we may claim legal exemptions for certain types of Personal Data and from certain parts of the CTDPA.

This section applies only to Connecticut residents. As a Connecticut resident, you have the rights listed below. However, these rights are not absolute, and, in certain cases, we may decline your request as permitted by law.

To exercise any of these rights, please click [here](#).

Consumer Right	Description
Confirm and Access	You may request that we confirm whether we are processing your Personal Data. You may also request a copy of your Personal Data.
Correction	You may request to edit or correct your Personal Data at any time.
Deletion	You may have the right, under certain circumstances, to request that we delete the Personal Data you have provided to us.
Opt-Out of Tracking for Targeted Advertising Purposes	You can submit requests to opt-out of tracking for targeted advertising purposes.
Opt-Out of Profiling	You can opt-out of the automated processing of your Personal Data to evaluate, analyze, or predict personal aspects related to your economic situation, health, personal preferences, interests, reliability, behavior, location, or movements, to the extent this results in decisions that produce legal or similarly significant effects.
Opt-Out of Sales	The CTDPA may classify our use of some services as “selling” your Personal Data with the partners that provide the services. You may submit a request to opt-out of “selling” of your Personal Data.

Sensitive Personal Data	We will not process your sensitive Personal Data without your consent.
Non-Discrimination	You have the right to be free from discrimination related to your exercise of any of your Connecticut privacy rights.

Exercising Your Privacy Rights

Process	Description
Authentication	<p>In order to protect your Personal Data from unauthorized access or deletion, we may require you to verify your account credentials before you can submit a rights request. If you do not have an account with us, or if we suspect that your account has been accessed without your authorization, we may ask you to provide additional Personal Data for verification.</p> <p>We are legally obligated to verify your identity when you submit a request. We may request additional information from you to verify your identity. If you submit a request to delete your Personal Data, you will also be required to confirm the deletion request by email.</p> <p>If we are subsequently unable to confirm your identity, we may refuse your rights request.</p>
Use of Authorized Agents	You may use an authorized agent to submit a rights request. If you do so, the authorized agent must present signed written authorization to act on your behalf, and you will also be required to independently verify your own identity directly with us and confirm with us that you provided the authorized agent permission to submit the rights request.

YOUR PRIVACY RIGHTS – NEVADA

Nevada provides its residents with a limited right to opt-out of certain Personal Information sales.

Residents who wish to exercise this sale opt-out right may submit a request to the contact above under "CONTACT INFORMATION."

YOUR PRIVACY RIGHTS – UTAH

To the extent the law applies to Company, Company is required under the Utah Consumer Privacy Act (“UCPA”) to provide certain information to Utah residents about how we collect, use, and share their Personal Data in our capacity as a business, and about the rights and choices Utah residents may have concerning their Personal Data. For purposes of this section, “Personal Data” has the meaning provided in the UCPA and does not include information exempted from the scope of the UCPA. Please note that we may claim legal exemptions for certain types of Personal Data and from certain parts of the UCPA.

This section applies only to Utah residents. As a Utah resident, you have the rights listed below. However, these rights are not absolute, and, in certain cases, we may decline your request as permitted by law.

To exercise any of these rights, please click [here](#).

Consumer Right	Description
Confirm and Access	You may request that we confirm whether we are processing your Personal Data. You may also request a copy of your Personal Data.
Deletion	You may have the right, under certain circumstances, to request that we delete the Personal Data you have provided to us.
Opt-Out of Tracking for Targeted Advertising Purposes	You can submit requests to opt-out of tracking for targeted advertising purposes.
Opt-Out of Sales	The UCPA may classify our use of some services as “selling” your Personal Data with the partners that provide the services. You may submit a request to opt-out of “selling” of your Personal Data.
Sensitive Personal Information	You may submit requests to opt-out of the use of “Sensitive Data” as defined by the UCPA.
Non-Discrimination	You have the right to be free from discrimination related to your exercise of any of your Utah privacy rights.

Exercising Your Privacy Rights

Process	Description
Authentication	<p>In order to protect your Personal Data from unauthorized access or deletion, we may require you to verify your account credentials before you can submit a rights request. If you do not have an account with us, or if we suspect that your account has been accessed without your authorization, we may ask you to provide additional Personal Data for verification.</p> <p>We are legally obligated to verify your identity when you submit a request. We may request additional information from you to verify your identity. If you submit a request to delete your Personal Data, you will also be required to confirm the deletion request by email.</p> <p>If we are subsequently unable to confirm your identity, we may refuse your rights request.</p>

YOUR PRIVACY RIGHTS – VIRGINIA

To the extent the law applies to Company, Company is required under the Virginia Consumer Data Protection Act (“VCDPA”) to provide certain information to Virginia residents about how we collect, use, and share their Personal Data in our capacity as a business, and about the rights and choices Virginia residents may have concerning their Personal Data. For purposes of this section, “Personal Data” has the meaning provided in the VCDPA and does not include information exempted from the scope of the VCDPA. Please note that we may claim legal exemptions for certain types of Personal Data and from certain parts of the VCDPA.

This section applies only to Virginia residents. As a Virginia resident, you have the rights listed below. However, these rights are not absolute, and, in certain cases, we may decline your request as permitted by law.

To exercise any of these rights, please click [here](#).

Consumer Right	Description
Confirm, Access, and Data Portability	You may request that we confirm whether we are processing your Personal Data. You may also request a copy of your Personal Data in a portable and readily usable format.
Correction	You may request to edit or correct your Personal Data at any time.
Deletion	You may have the right, under certain circumstances, to request that we delete the Personal Data you have provided to us.
Opt-Out of Tracking for Targeted Advertising Purposes	You can submit requests to opt-out of tracking for targeted advertising purposes.
Opt-Out of Profiling	You can opt-out of the automated processing of your Personal Data to evaluate, analyze, or predict personal aspects related to your economic situation, health, personal preferences, interests, reliability, behavior, location, or movements, to the extent this results in decisions that produce legal or similarly significant effects.

Opt-Out of Sales	The VCDPA may classify our use of some services as “selling” your Personal Data with the partners that provide the services. You may submit a request to opt-out of “selling” of your Personal Data.
Sensitive Personal Data	We will not process your sensitive Personal Data without your consent.
Non-Discrimination	You have the right to be free from discrimination related to your exercise of any of your Virginia privacy rights.

Exercising Your Privacy Rights

Process	Description
Authentication	<p>In order to protect your Personal Data from unauthorized access or deletion, we may require you to verify your account credentials before you can submit a rights request. If you do not have an account with us, or if we suspect that your account has been accessed without your authorization, we may ask you to provide additional Personal Data for verification.</p> <p>We are legally obligated to verify your identity when you submit a request. We may request additional information from you to verify your identity. If you submit a request to delete your Personal Data, you will also be required to confirm the deletion request by email.</p> <p>If we are subsequently unable to confirm your identity, we may refuse your rights request.</p>