#### **Privacy Policy for TIPP Bucket**

# **Privacy Policy**

Last updated: July 25, 2022

This Privacy Policy describes Our policies and procedures on the collection, use and dis closure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, Y ou agree to the collection and use of information in accordance with this Privacy Policy.

# **Interpretation and Definitions**

### Interpretation

The words of which the initial letter is capitalized have meanings defined under the follo wing conditions. The following definitions shall have the same meaning regardless of wh ether they appear in singular or in plural.

### Definitions

For the purposes of this Privacy Policy:

- Account means a unique account created for You to access our Service or parts of our Service.
- Affiliate means an entity that controls, is controlled by or is under common contr ol with a party, where "control" means ownership of 50% or more of the shares, e quity interest or other securities entitled to vote for election of directors or other m anaging authority.
- **Application** means the software program provided by the Company downloaded by You on any electronic device, named TIPP Bucket
- **Business**, for the purpose of the CCPA (California Consumer Privacy Act), refer s to the Company as the legal entity that collects Consumers' personal informatio n and determines the purposes and means of the processing of Consumers' pers

onal information, or on behalf of which such information is collected and that alon e, or jointly with others, determines the purposes and means of the processing of consumers' personal information, that does business in the State of California.

• **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agree ment) refers to TIPP BUCKET LLC, P.O. Box 53, West Friendship, MD 21794.

For the purpose of the GDPR, the Company is the Data Controller.

- Consumer, for the purpose of the CCPA (California Consumer Privacy Act), mea ns a natural person who is a California resident. A resident, as defined in the law, includes (1) every individual who is in the USA for other than a temporary or tran sitory purpose, and (2) every individual who is domiciled in the USA who is outsid e the USA for a temporary or transitory purpose.
- **Country** refers to: Maryland, United States
- **Data Controller**, for the purposes of the GDPR (General Data Protection Regula tion), refers to the Company as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data.
- **Device** means any device that can access the Service such as a computer, a cell phone or a digital tablet.
- Do Not Track (DNT) is a concept that has been promoted by US regulatory auth orities, in particular the U.S. Federal Trade Commission (FTC), for the Internet in dustry to develop and implement a mechanism for allowing internet users to contr ol the tracking of their online activities across websites.
- Facebook Fan Page is a public profile named TIPP Bucket specifically created b y the Company on the Facebook social network, accessible from <u>https://Faceboo</u> <u>k.com/tipp-bucket</u>
- **Personal Data** is any information that relates to an identified or identifiable indivi dual.

For the purposes of GDPR, Personal Data means any information relating to You such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

For the purposes of the CCPA, Personal Data means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with You.

• Sale, for the purpose of the CCPA (California Consumer Privacy Act), means sell ing, renting, releasing, disclosing, disseminating, making available, transferring, o r otherwise communicating orally, in writing, or by electronic or other means, a C

onsumer's personal information to another business or a third party for monetary or other valuable consideration.

- Service refers to the Application.
- Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used. For the purpose of the GDPR, Service Provid ers are considered Data Processors.
- **Third-party Social Media Service** refers to any website or any social network w ebsite through which a User can log in or create an account to use the Service.
- Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- You means the individual accessing or using the Service, or the company, or oth er legal entity on behalf of which such individual is accessing or using the Service , as applicable.

Under GDPR (General Data Protection Regulation), You can be referred to as the Data Subject or as the User as you are the individual using the Service.

# Collecting and Using Your Perso nal Data

## **Types of Data Collected**

#### **Personal Data**

While using Our Service, We may ask You to provide Us with certain personally identifia ble information that can be used to contact or identify You. Personally identifiable inform ation may include, but is not limited to:

- Email address
- First name and last name

- Phone number
- Address, State, Province, ZIP/Postal code, City
- Usage Data

#### **Usage Data**

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e .g. IP address), browser type, browser version, the pages of our Service that You visit, t he time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain inf ormation automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operat ing system, the type of mobile Internet browser You use, unique device identifiers and o ther diagnostic data.

We may also collect information that Your browser sends whenever You visit our Servic e or when You access the Service by or through a mobile device.

#### Information from Third-Party Social Media Services

The Company allows You to create an account and log in to use the Service through the following Third-party Social Media Services:

- Google
- Facebook
- Twitter
- LinkedIn

If You decide to register through or otherwise grant us access to a Third-Party Social M edia Service, We may collect Personal data that is already associated with Your Third-P arty Social Media Service's account, such as Your name, Your email address, Your activities or Your contact list associated with that account.

You may also have the option of sharing additional information with the Company throu gh Your Third-Party Social Media Service's account. If You choose to provide such infor mation and Personal Data, during registration or otherwise, You are giving the Compan y permission to use, share, and store it in a manner consistent with this Privacy Policy.

#### Information Collected while Using the Application

While using Our Application, in order to provide features of Our Application, We may collect, with Your prior permission:

- Information regarding your location
- Pictures and other information from your Device's camera and photo library

We use this information to provide features of Our Service, to improve and customize O ur Service. The information may be uploaded to the Company's servers and/or a Servic e Provider's server or it may be simply stored on Your device.

You can enable or disable access to this information at any time, through Your Device s ettings, using the "Delete Account" feature.

#### **Use of Your Personal Data**

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including to monitor the usage of our Service.
- **To manage Your Account:** to manage Your registration as a user of the Service . The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- For the performance of a contract: the development, compliance and undertaki ng of the purchase contract for the products, items or services You have purchas ed or of any other contract with Us through the Service.
- To contact You: To contact You by email, telephone calls, SMS, or other equival ent forms of electronic communication, such as a mobile application's push notific ations regarding updates or informative communications related to the functionali ties, products or contracted services, including the security updates, when neces sary or reasonable for their implementation.
- To provide You with news, special offers and general information about other go ods, services and events which we offer that are similar to those that you have al ready purchased or enquired about unless You have opted not to receive such in formation.
- To manage Your requests: To attend and manage Your requests to Us.
- For business transfers: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or tran

sfer of some or all of Our assets, whether as a going concern or as part of bankru ptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.

• For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our prom otional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

- With Service Providers: We may share Your personal information with Service Providers to monitor and analyze the use of our Service, for payment processing, to contact You.
- For business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, f inancing, or acquisition of all or a portion of Our business to another company.
- With Affiliates: We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our p arent company and any other subsidiaries, joint venture partners or other compa nies that We control or that are under common control with Us.
- With business partners: We may share Your information with Our business part ners to offer You certain products, services or promotions.
- With other users: when You share personal information or otherwise interact in t he public areas with other users, such information may be viewed by all users an d may be publicly distributed outside. If You interact with other users or register t hrough a Third-Party Social Media Service, Your contacts on the Third-Party Soci al Media Service may see Your name, profile, pictures and description of Your ac tivity. Similarly, other users will be able to view descriptions of Your activity, com municate with You and view Your profile.
- With Your consent: We may disclose Your personal information for any other purpose with Your consent.

#### **Retention of Your Personal Data**

The Company will retain Your Personal Data only for as long as is necessary for the pur poses set out in this Privacy Policy. We will retain and use Your Personal Data to the ex tent necessary to comply with our legal obligations (for example, if we are required to ret ain your data to comply with applicable laws), resolve disputes, and enforce our legal ag reements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strength en the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

#### **Transfer of Your Personal Data**

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers lo cated outside of Your state, province, country or other governmental jurisdiction where t he data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information rep resents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treate d securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls i n place including the security of Your data and other personal information.

#### **Disclosure of Your Personal Data**

#### **Business Transactions**

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data m ay be transferred. We will provide notice before Your Personal Data is transferred and b ecomes subject to a different Privacy Policy.

#### Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e. g. a court or a government agency).

#### Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

• Comply with a legal obligation

- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

## **Security of Your Personal Data**

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While W e strive to use commercially acceptable means to protect Your Personal Data, We cann ot guarantee its absolute security.

# Detailed Information on the Proc essing of Your Personal Data

The Service Providers We use may have access to Your Personal Data. These third-par ty vendors collect, store, use, process and transfer information about Your activity on O ur Service in accordance with their Privacy Policies.

#### Analytics

We may use third-party Service providers to monitor and analyze the use of our Service

#### Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and rep orts website traffic. Google uses the data collected to track and monitor the use o f our Service. This data is shared with other Google services. Google may use th e collected data to contextualize and personalize the ads of its own advertising n etwork.

You may opt-out of certain Google Analytics features through your mobile device settings, such as your device advertising settings or by following the instructions provided by Google in their Privacy Policy: <u>https://policies.google.com/privacy</u>

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <u>https://policies.google.com/privacy</u>

• Firebase

Firebase is an analytics service provided by Google Inc.

You may opt-out of certain Firebase features through your mobile device settings , such as your device advertising settings or by following the instructions provide d by Google in their Privacy Policy: <u>https://policies.google.com/privacy</u>

We also encourage you to review the Google's policy for safeguarding your data : <u>https://support.google.com/analytics/answer/6004245</u>

For more information on what type of information Firebase collects, please visit th e How Google uses data when you use our partners' sites or apps webpage: <u>http</u> <u>s://policies.google.com/technologies/partner-sites</u>

## **Email Marketing**

We may use Your Personal Data to contact You with newsletters, marketing or promotio nal materials and other information that may be of interest to You. You may opt-out of re ceiving any, or all, of these communications from Us by following the unsubscribe link or instructions provided in any email We send or by contacting Us.

We may use Email Marketing Service Providers to manage and send emails to You.

#### Mailchimp

Mailchimp is an email marketing sending service provided by The Rocket Scienc e Group LLC.

For more information on the privacy practices of Mailchimp, please visit their Priv acy policy: <u>https://mailchimp.com/legal/privacy/</u>

#### **Payments**

We may provide paid products and/or services within the Service. In that case, we may use third-party services for payment processing (e.g. payment processors).

We will not store or collect Your payment card details. That information is provided direc tly to Our third-party payment processors whose use of Your personal information is gov erned by their Privacy Policy. These payment processors adhere to the standards set b y PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of

brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements h elp ensure the secure handling of payment information.

#### • Apple Store In-App Payments

Their Privacy Policy can be viewed at <a href="https://www.apple.com/legal/privacy/en-ww">https://www.apple.com/legal/privacy/en-ww</a>

#### Google Play In-App Payments

Their Privacy Policy can be viewed at <a href="https://www.google.com/policies/privacy/">https://www.google.com/policies/privacy/</a>

Stripe

Their Privacy Policy can be viewed at <a href="https://stripe.com/us/privacy">https://stripe.com/us/privacy</a>

PayPal

Their Privacy Policy can be viewed at <a href="https://www.paypal.com/webapps/mpp/ua/privacy-full">https://www.paypal.com/webapps/mpp/ua/privacy-full</a>

### **Usage, Performance and Miscellaneous**

We may use third-party Service Providers to provide better improvement of our Service.

Google Places

Google Places is a service that returns information about places using HTTP req uests. It is operated by Google

Google Places service may collect information from You and from Your Device for security purposes.

The information gathered by Google Places is held in accordance with the Privac y Policy of Google: <u>https://www.google.com/intl/en/policies/privacy/</u>

# **GDPR** Privacy

# Legal Basis for Processing Personal Dat a under GDPR

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 perf ormance of an agreement with You and/or for any pre-contractual obligations the reof.
- 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 v ital 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 o f the legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies t o 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 the GDPR

The Company undertakes to respect the confidentiality of Your Personal Data and to gu arantee 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 t he information We have on You. Whenever made possible, you can access, upd ate or request deletion of Your Personal Data directly within Your account setting s section. If you are unable to perform these actions yourself, please contact Us t o assist You. This also enables You to receive a copy of the Personal Data We h old about You.
- Request correction of the Personal Data that We hold about You. You have t he right to have any incomplete or inaccurate information We hold about You corr ected.
- **Object to processing of Your Personal Data.** This right exists where We are re lying on a legitimate interest as the legal basis for Our processing and there is so mething about Your particular situation, which makes You want to object to our pr ocessing 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 proces sing it.
- Request the transfer of Your Personal Data. We will provide to You, or to a thir d-party You have chosen, Your Personal Data in a structured, commonly used, m achine-readable format. Please note that this right only applies to automated info rmation which You initially provided consent for Us to use or where We used the i nformation 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 provid e You with access to certain specific functionalities of the Service.

# Exercising of Your GDPR Data Protectionn Rights

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

You have the right to complain to a Data Protection Authority about Our collection and u se of Your Personal Data. For more information, if You are in the European Economic A rea (EEA), please contact Your local data protection authority in the EEA.

## Facebook Fan Page

## Data Controller for the Facebook Fan Pa

#### ge

The Company is the Data Controller of Your Personal Data collected while using the Se rvice. As operator of the Facebook Fan Page <u>https://Facebook.com/tipp-bucket</u>, the Co mpany and the operator of the social network Facebook are Joint Controllers.

The Company has entered into agreements with Facebook that define the terms for use of the Facebook Fan Page, among other things. These terms are mostly based on the F acebook Terms of Service: <u>https://www.facebook.com/terms.php</u>

Visit the Facebook Privacy Policy <u>https://www.facebook.com/policy.php</u> for more inform ation about how Facebook manages Personal data or contact Facebook online, or by m ail: Facebook, Inc. ATTN, Privacy Operations, 1601 Willow Road, Menlo Park, CA 9402 5, United States.

## **Facebook Insights**

We use the Facebook Insights function in connection with the operation of the Faceboo k Fan Page and on the basis of the GDPR, in order to obtain anonymized statistical dat a about Our users.

For this purpose, Facebook places a Cookie on the device of the user visiting Our Face book Fan Page. Each Cookie contains a unique identifier code and remains active for a period of two years, except when it is deleted before the end of this period.

Facebook receives, records and processes the information stored in the Cookie, especi ally when the user visits the Facebook services, services that are provided by other me mbers of the Facebook Fan Page and services by other companies that use Facebook services.

For more information on the privacy practices of Facebook, please visit Facebook Priva cy Policy here: <u>https://www.facebook.com/privacy/explanation</u>

# **CCPA** Privacy

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

## Categories of Personal Information Colle cted

We collect information that identifies, relates to, describes, references, is capable of bei ng 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 twel ve (12) months.

Please note that the categories and examples provided in the list below are those define d in the CCPA. This does not mean that all examples of that category of personal inform ation were in fact collected by Us, but reflects our good faith belief to the best of our kno

wledge that some of that information from the applicable category may be and may hav e been collected. For example, certain categories of personal information would only be collected if You provided such personal information directly to Us.

#### • Category A: Identifiers.

Examples: A real name, alias, postal address, unique personal identifier, online i dentifier, Internet Protocol address, email address, account name, driver's licens e number, passport number, or other similar identifiers.

Collected: Yes.

#### • Category B: Personal information categories listed in the California Custom er Records statute (Cal. Civ. Code § 1798.80(e)).

Examples: A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or stat e identification card number, insurance policy number, education, employment, e mployment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance infor mation. Some personal information included in this category may overlap with oth er categories.

Collected: Yes.

#### • Category C: Protected classification characteristics under California or fed eral law.

Examples: Age (40 years or older), race, color, ancestry, national origin, citizensh ip, religion or creed, marital status, medical condition, physical or mental disabilit y, sex (including gender, gender identity, gender expression, pregnancy or childbi rth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Collected: No.

#### • Category D: Commercial information.

Examples: Records and history of products or services purchased or considered.

Collected: Yes.

#### • Category E: Biometric information.

Examples: Genetic, physiological, behavioral, and biological characteristics, or ac tivity patterns used to extract a template or other identifier or identifying informati on, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystrok e, gait, or other physical patterns, and sleep, health, or exercise data.

Collected: No.

#### • Category F: Internet or other similar network activity.

Examples: Interaction with our Service or advertisement.

Collected: Yes.

#### • Category G: Geolocation data.

Examples: Approximate physical location.

Collected: Yes.

#### • Category H: Sensory data.

Examples: Audio, electronic, visual, thermal, olfactory, or similar information.

Collected: No.

#### • Category I: Professional or employment-related information.

Examples: Current or past job history or performance evaluations.

Collected: No.

### • Category J: Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).

Examples: Education records directly related to a student maintained by an educ ational institution or party acting on its behalf, such as grades, transcripts, class li sts, student schedules, student identification codes, student financial information, or student disciplinary records.

Collected: No.

#### • Category K: Inferences drawn from other personal information.

Examples: Profile reflecting a person's preferences, characteristics, psychologica I trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Collected: No.

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 o f Medical Information Act (CMIA) or clinical trial data
  - Personal Information covered by certain sector-specific privacy laws, inclu ding the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (G LBA) 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 categor ies of sources:

- **Directly from You**. For example, from the forms You complete on our Service, p references 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 Provi ders set on Your Device as You navigate through our Service.
- From Service Providers. For example, third-party vendors to monitor and analy ze the use of our Service, third-party vendors for payment processing, or other thi rd-party vendors that We use to provide the Service to You.

# Use of Personal Information for Busines s Purposes or Commercial Purposes

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

- To operate our Service and provide You with our Service.
- To provide You with support and to respond to Your inquiries, including to investi gate and address Your concerns and monitor and improve our Service.
- To fulfill or meet the reason You provided the information. For example, if You sh are Your contact information to ask a question about our Service, We will use tha

t personal information to respond to Your inquiry. If You provide Your personal inf ormation to purchase a product or service, We will use that information to proces s 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 s et 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 s uch activities.

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

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

# Disclosure of Personal Information for B usiness Purposes or Commercial Purpo

#### ses

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:

- Category A: Identifiers
- Category B: Personal information categories listed in the California Customer Re cords statute (Cal. Civ. Code § 1798.80(e))
- Category D: Commercial information
- Category F: Internet or other similar network activity
- Category G: Geolocation data

Please note that the categories listed above are those defined in the CCPA. This does n ot mean that all examples of that category of personal information were in fact disclosed , but reflects our good faith belief to the best of our knowledge that some of that informat ion from the applicable category may be and may have been disclosed.

When We disclose personal information for a business purpose or a commercial purpos e, We enter a contract that describes the purpose and requires the recipient to both kee p 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, dis seminating, 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 kin d of benefit in return for sharing personal information, but not necessarily a monetary be nefit.

Please note that the categories listed below are those defined in the CCPA. This does n ot mean that all examples of that category of personal information were in fact sold, but reflects our good faith belief to the best of our knowledge that some of that information fr om 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 o f personal information:

- Category A: Identifiers
- Category B: Personal information categories listed in the California Customer Re cords statute (Cal. Civ. Code § 1798.80(e))
- Category D: Commercial information
- Category F: Internet or other similar network activity
- Category G: Geolocation data

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

We may share Your personal information identified in the above categories with the follo wing 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 p ersonal information in connection with products or services We provide to You

## Sale of Personal Information of Minors U nder 16 Years of Age

We do not knowingly collect personal information from minors under the age of 16 throu gh our Service, although certain third party websites that we link to may do so. These thi rd-party websites have their own terms of use and privacy policies and we encourage p arents and legal guardians to monitor their children's Internet usage and instruct their ch ildren 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 1 6 years of age, unless We receive affirmative authorization (the "right to opt-in") from eit her 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 inf ormation may opt-out of future sales at any time. To exercise the right to opt-out, You (o r 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 wi th personal information, please contact Us with sufficient detail to enable Us to delete th at information.

### Your Rights under the CCPA

The CCPA provides California residents with specific rights regarding their personal info rmation. 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 Person al Data are being collected and the purposes for which the Personal Data is bein g used.
- The right to request. Under CCPA, You have the right to request that We disclo se information to You about Our collection, use, sale, disclosure for business pur poses and share of personal information. Once We receive and confirm Your req uest, 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 informati on
- The specific pieces of personal information We collected about You
- If we sold Your personal information or disclosed Your personal informatio n 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 t o direct Us to not sell Your personal information. To submit an opt-out request pl ease 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 anti cipated within the context of our ongoing business relationship with You, o r 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 f unctionality.
  - Exercise free speech, ensure the right of another consumer to exercise th eir free speech rights, or exercise another right provided for by law.
  - Comply with the California Electronic Communications Privacy Act (Cal. P enal Code § 1546 et. seq.).

- Engage in public or peer-reviewed scientific, historical, or statistical resear ch in the public interest that adheres to all other applicable ethics and priv acy laws, when the information's deletion may likely render impossible or s eriously impair the research's achievement, if You previously provided info rmed consent.
- Enable solely internal uses that are reasonably aligned with consumer exp ectations 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 servi ces or a different level or quality of goods or services

# Exercising Your CCPA Data Protection R ights

In order to exercise any of Your rights under the CCPA, and if You are a California resid ent, You can contact Us:

• By email: Info@tippbucket.app

Only You, or a person registered with the California Secretary of State that You authoriz e to act on Your behalf, may make a verifiable request related to Your personal informat ion.

Your request to Us must:

 Provide sufficient information that allows Us to reasonably verify You are the pers on about whom We collected personal information or an authorized representativ e • 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 c annot:

- 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 rec eiving Your verifiable request. The time period to provide the required information may b e extended once by an additional 45 days when reasonably necessary and with prior no tice.

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 informatio n 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 i nformation. To exercise Your right to opt-out, please contact Us.

The Service Providers we partner with (for example, our analytics or advertising partner s) 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-bas ed advertising purposes and these potential sales as defined under CCPA law, you may do so by following the instructions below.

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

#### Website

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

- The NAI's opt-out platform: <u>http://www.networkadvertising.org/choices/</u>
- 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 t o 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 th e 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 d evices
- "Limit Ad Tracking" on iOS devices

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

# "Do Not Track" Policy as Requir ed 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 we bsites 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, ple ase contact Us. If We become aware that We have collected Personal Data from anyon e under the age of 13 without verification of parental consent, We take steps to remove t hat 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 re sidents 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 mark eting 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 provide d below.

# California Privacy Rights for Min or Users (California Business an d Professions Code Section 225 81)

California Business and Professions Code Section 22581 allows California residents un der the age of 18 who are registered users of online sites, services or applications to re quest 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 associa ted 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.

## **Links to Other Websites**

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise Yo u to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies o r practices of any third party sites or services.

## **Changes to this Privacy Policy**

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the ch ange becoming effective and update the "Last updated" date at the top of this Privacy P olicy.

You are advised to review this Privacy Policy periodically for any changes. Changes to t his Privacy Policy are effective when they are posted on this page.

## **Contact Us**

If you have any questions about this Privacy Policy, You can contact us:

• By email: Info@tippbucket.app