

Privacy Policy for California Residents - Consumers

Effective Date: January 1, 2023

Last Updated on: January 1, 2023

This **Privacy Policy for California Residents** supplements the information contained in our Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") as amended by the California Privacy Rights Act ("CPRA") and any terms defined in the CCPA and CPRA have the same meaning when used in this Policy.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.

In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, address, telephone number. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO

D. Commercial information.	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
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)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, predispositions, behavior, attitudes.	YES

We have collected the following categories of sensitive personal information from some consumers within the last twelve (12) months:

Category	Collected
A. Government Identifiers.	NO
B. Complete Account Access Credentials	NO
C. Precise Geolocation	NO
D. Racial or Ethnic Origin	NO
E. Religious or Philosophical Beliefs	NO
F. Union Membership	NO
G. Genetic Data	NO
H. Mail, Email or Text Messages Contents	YES
I. Unique Identifying Biometric Information	YES
J. Health, Sex Life or Sexual Orientation Information	NO

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

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Website.
- Automatically from you. For example, through cookies we or our Service Providers set on your device as you navigate through our website.
- Through other sources, such as service providers, third party services and joint marketing partners. For example, third-party vendors to monitor and analyze the use of our website, third-party vendors to deliver targeted advertising to you, or third-party data brokers.

Behavioral Advertising

We may use a type of advertising commonly known as interest-based or online behavioral advertising. This means that some of our partners use Tracking Tools to collect information about a user’s online activities to display Company ads to the user based on the user’s interests (“Behavioral Advertising”). Our partners may include third-party advertisers and other third party service providers, and such partners may collect information when you use the Company Services, such as IP address, mobile device ID, operating system, and demographic information. These Tracking Tools help Company learn more about our users’ demographics and Internet behaviors.

Retention of Your Personal Information

We will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We 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 strengthen the security or to improve the functionality of our website or we are legally obligated to retain this data for longer time periods.

Use of Personal Information

We may use, sell, or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products or services, we will use that personal information to respond to your inquiry.
- To provide, support, personalize, and develop our Website, products, and services.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To facilitate cross-context behavioral advertising.
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To 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 Website users/consumers is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, Company has disclosed personal information for a business purpose to the categories of third parties indicated in the chart below.

Although we do not sell your personal information in the traditional sense, the definition of “sale” under the California law is very broad and may cover many common business activities not otherwise considered selling information for money, such as sharing certain technical information with third party data analytics, marketing, and advertising partners. You have a right to opt-out of this sharing. In the preceding twelve (12) months, Company has disclosed or sold/shared for behavioral advertising the following categories of information.. For more on your personal information sale rights, see [Personal Information Sales Opt-Out and Opt-In Rights](#).

Personal Information Category	Category of Third-Party Recipients	
	Business Purpose Disclosures	Sales/Sharing for Cross-Contextual Advertising
A: Identifiers.	Advertising networks, Internet service providers, data analytic providers, operating systems and platforms, social networks, data brokers or aggregators, service providers, partners, Internet cookie data recipients, Parent or subsidiary organizations.	Advertising networks, Internet service providers, data analytic providers, operating systems and platforms, social networks, data brokers or aggregators, service providers, partners, Internet cookie data recipients, Parent or subsidiary organizations.
B: California Customer Records personal information categories.	Internet service providers, data analytic providers, operating systems and platforms, social networks, data brokers or aggregators, service providers, partners, parent or subsidiary organizations.	Internet service providers, data analytic providers, operating systems and platforms, social networks, data brokers or aggregators, service providers, partners, parent or subsidiary organizations.
C: Protected classification characteristics under California or federal law.	None	None
D: Commercial information.	Advertising networks, Internet service providers, data analytic	Advertising networks, Internet service providers, data analytic

	providers, operating systems and platforms, social networks, data brokers or aggregators, service providers, partners, Internet cookie data recipients, parent or subsidiary organizations.	providers, operating systems and platforms, social networks, data brokers or aggregators, service providers, partners, Internet cookie data recipients, parent or subsidiary organizations.
E: Biometric information.	Service provider	None
F: Internet or other similar network activity.	Advertising networks, Internet service providers, data analytic providers, operating systems and platforms, social networks, data brokers or aggregators, service providers, partners, Internet cookie data recipients, parent or subsidiary organizations.	Advertising networks, Internet service providers, data analytic providers, operating systems and platforms, social networks, data brokers or aggregators, service providers, partners, Internet cookie data recipients, parent or subsidiary organizations.
G: Geolocation data.	Advertising networks, Internet service providers, data analytic providers, operating systems and platforms, social networks, data brokers or aggregators, service providers, partners, Internet cookie data recipients, parent or subsidiary organizations.	Advertising networks, Internet service providers, data analytic providers, operating systems and platforms, social networks, data brokers or aggregators, service providers, partners, Internet cookie data recipients, parent or subsidiary organizations.
H: Sensory data.	None	None
I: Professional or employment-related information.	None	None
J: Non-public education information.	None	None
K: Inferences drawn from other personal information.	Advertising networks, Internet service providers, data analytic providers, operating systems and platforms, social networks, data brokers or aggregators, service	Advertising networks, Internet service providers, data analytic providers, operating systems and platforms, social networks, data brokers or

	providers, partners, Internet cookie data recipients, parent or subsidiary organizations.	aggregators, service providers, partners, Internet cookie data recipients, parent or subsidiary organizations.
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Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity (see [Exercising Your Rights to Know, Delete or Revise](#)), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales/sharing of information for cross-contextual behavioral advertising, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the "right to delete"). Once we receive your request and confirm your identity (see [Exercising Your Rights to Know, Delete or Revise](#)), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.

2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

Right to Revise

You have the right to request that we correct inaccurate personal information. Once we receive your request and confirm your identity (see Exercising Your Rights to Know, Delete or Revise), we will correct the inaccurate personal information.

Exercising Your Rights to Know, Delete or Revise

To exercise your rights to know or delete described above, please submit a request by either:

- Calling us at 866-216-2175.
- Emailing us at hfc.privacy@gohfc.com.
- Visiting our Privacy Portal

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information.

You may also make a request to know or delete on behalf of your child.

You may only submit a request to know twice within a 12-month period. Your request to know or delete must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include two or more of the following:
 - An email address that matches an email address we already have on file for you.
 - A telephone number that matches a telephone number we already have on file for you.

- A physical address that matches a physical address we already have on file for you.
- A form of identification such as a driver's license.
- If you wish to appoint an agent to make requests on your behalf, submit a power of attorney appointing your agent to make requests on your behalf to hfc.privacy@gohfc.com.
- 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 personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know or delete.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

For instructions on exercising your sale or sharing opt-out or opt-in rights, see [Personal Information Sales Opt-Out and Opt-In Rights](#).

Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please email us at hfc.privacy@gohfc.com.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out and Opt-In Rights

If you are age 16 or older, you have the right to direct us to not sell or share your personal information at any time (the "right to opt-out"). We do not sell or share the personal information of consumers we actually know are less than 16 years old, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 15 years old, or the parent or guardian of a consumer less than 13 years old. Consumers who opt-in to personal information sales or sharing may opt-out of future sales or sharing at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link:

Do Not Sell My Personal Information

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by emailing hfc.privacy@gohfc.com.

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

Cross-Context Behavioral Advertising Opt-Out and Opt-In Rights

You have the right to direct us to not share your personal information for cross-context behavioral advertising purposes.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link:

Do Not Share My Personal Information for Cross-Context Behavioral Advertising

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sharing for cross-context behavioral advertising. However, you may change your mind and opt back in to personal information sharing for cross-context behavioral advertising at any time by emailing hfc.privacy@gohfc.com.

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

Sensitive Personal Information Use and Disclosure Limitations

You have the right to limit the use or disclosure of your sensitive personal information to just actions necessary to:

- Perform services or provide goods that an average consumer requesting those goods or services would reasonably expect.
- Help ensure security and integrity, if that use is reasonably necessary and proportionate.
- Perform short-term, transient uses, including but not limited to non-personalized advertising shown as part of your current interaction with us, if we do not:
 - disclose the sensitive personal information to another third party; or
 - use it to build a profile about you or otherwise alter your experience outside of your current interaction with us.
- Perform services including:
 - maintaining or servicing accounts;

- providing customer service;
- processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage or providing similar services.
- Verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us.
- Improve, upgrade or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.
- To perform other actions that CPRA regulations authorize.

We do not use, or disclose to a service provider or contractor, sensitive personal information for purposes other than what the CPRA specifically allows after you exercise your limitation right.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to hfc.privacy@gohfc.com or write us at:

19000 MacArthur Blvd, Suite 100
Irvine, CA 92612

Third Party Web Services

HFC Services may contain links or content from third party websites. A link or content from a third-party website does not mean we endorse that website, the accuracy of information presented, or the persons or entities associated with that website. If you visit a third-party website, you are subject to the privacy policy of the applicable third party and we are not responsible for the policies

and/or practices of any third party. We encourage you to ask questions before you disclose your information to others.

Changes to Our Privacy Policy

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which HFC collects and uses your information described here and in the **Privacy Policy**, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 866-216-2175

Website: homefranchiseconcepts.com

Email: hfc.privacy@gohfc.com

Postal Address:

Home Franchise Concepts, LLC
Attn: Privacy Office
19000 MacArthur Blvd, Suite 100
Irvine, CA 92612

If you need to access this Policy in an alternative format due to having a disability, please contact hfc.privacy@gohfc.com or 866-216-2175.