

ABC PHONES OF NORTH CAROLINA, INC. (“VICTRA”)

Privacy Policy

Last updated January 29, 2024

THIS WEBSITE USES WEB TECHNOLOGIES THAT TRACK YOUR ACTIVITY ACROSS WEBSITES, SESSIONS AND DEVICES. THESE TECHNOLOGIES MAY ALSO RECORD YOUR INTERACTIONS WITH THE WEBSITE. BY CONTINUING TO VISIT THIS WEBSITE, YOU UNDERSTAND AND CONSENT TO THE USE OF THESE TECHNOLOGIES AND RELATED PROCESSING OF YOUR DATA. PLEASE DISCONTINUE USING THE WEBSITE IMMEDIATELY IF YOU DO NOT CONSENT TO THESE TOOLS AND THEIR ACTIVITIES.

At VICTRA (“we”, “us” or “our”), we are committed to maintaining strong and meaningful privacy protections for you, our guest (“you” or “consumer(s)”). Our privacy policy is designed to inform you about the Personal Information (“PI”) we collect, how we use and share it, and the choices you have about how your personal information is used and shared. Our privacy policy applies to data we collect from visitors online through the VICTRA website and mobile apps (collectively, the “Site”), as well as from visitors thorough offline channels such as interactions in our stores or phone calls. Additional privacy policies that apply to Verizon, Fios, and other services offered by the Verizon family of companies may be viewed in Verizon’s full privacy policy, which is linked [here](#) for your convenience.

For state specific information, please see Section 16 of this Policy.

This Privacy Policy may be updated from time to time. Please check back periodically for further updates and changes. If we make material changes, we may notify you by revising the Last Updated Date. We encourage you to review this Policy whenever you access our website or otherwise interact with us to stay informed about our latest data collection practices and the choices available to you.

You understand and agree that your continued use of the Site or interactions with us through offline channels after the effective date means that the collection, use, and sharing of your Personal Information is subject to the updated Policy. Except to the extent we receive your authorization, or as permitted or required by applicable law, we will handle your PI in accordance with the terms of the Policy in effect at the time of the collection. The most updated version will be available on our Site.

This Policy is incorporated into and subject to the Terms of Use https://victra.com/terms_of_use/. Unless otherwise noted, your use of the Site and continued interactions with us constitute your agreement to the Company using information about you in accordance with this Policy.

1. COLLECTION OF PERSONAL INFORMATION

As set forth below, we collect the following Personal Information about you. We use this information to operate the Site, carry out our business, comply with laws and for other purposes described in this Policy.

Information You Voluntarily Provide

We collect Personal Information that you provide when you interact with us, including but not limited to when you purchase a product or services, visit our store, participate in a sweepstakes or promotions, attend an event, contact us, request information, complete a survey, or apply for a job, We may also

collect photos, images, or video of you when you visit our facilities or stores and recordings of your voice when you call customer service.

You can always limit the information you provide to us, but if you choose not to provide certain requested information, you may be unable to access some of the functionality, offers, or content available on the Site or through offline channels.

Information We Collect Passively or Automatically

Any time you visit our Site, we may collect certain information, including without limitation

- the means you use to access our Site
- the precise location of your device or information about your approximate location each time you access our Site, in accordance with your device permissions
- your Internet Protocol (IP) address or other unique identifier of your computer, cell phone, or other device used to access our Websites
- browser information and reference site domain name when you visit any Website
- device identifier
- session data (e.g., your interactions with the Site, products you recently viewed, shopping cart, browsing history, date and time)
- user ID

We may collect your email address via cookies and pixels on the Site through the use of trusted third party partners. These partners may combine your email information with other information they have access to (e.g., a mailing address) so that we may serve relevant marketing offers to you via direct mail. For more information and your choices, please see the section on Cookies in Section 2, below.

We may collect or may have collected within the last twelve (12) months the following categories of Personal Information about you directly, automatically, or from third parties. Please see the Sources in Section 4, below.

Categories of Personal Information
Identifiers and other contact information (e.g., name, e-mail, telephone number, mailing address, date of birth, account username and password, IP address, online identifier, device Identifier, SSN, driver's license, signature, photo, education, bank account or credit card number, insurance policy number, financial information, medical or health information, education and employment history). Note that some of this information may also constitute Sensitive Information.
Characteristics of protected classifications under California or federal law (e.g., race, religion, age, military veteran status, disability, marital status, gender identity, sexual orientation, national origin sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions)). Note that some of this information may also constitute Sensitive Information.

Commercial Information (e.g., records of products or services purchased, obtained, or considered, or other purchasing histories or tendencies).
Education (e.g., information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act), Employment or Other Professional Information (e.g., information on your resume or job application; information collected while managing the employment relationship or created during your relationship with us). Note that some of this information may also constitute Sensitive Information.
Internet or Other Similar Network Activity (e.g., browsing history, search history, information on your interaction with our Site, chat history/logs, chat recordings or transcriptions, your interaction an ad or an email from us).
Geolocation data (e.g., physical location information while using one of our apps or Websites). If we collect precise geolocation, this is also considered Sensitive Information.
Audio, electronic, visual or similar information (e.g., identifiable information obtained from voicemail messages, while speaking with our service representatives, including on the telephone or through the chat feature on the Site, information captured by video cameras).
Biometric Data.
Sensitive Information as defined by applicable law (e.g., Social Security, driver's license, state identification card, or passport number; precise geolocation; racial or ethnic origin; union membership; the contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication; data related to citizenship or immigration status; data of children)
Inferences Draw from Personal Information (i.e., inferences drawn from any of the information above to create a profile reflecting your preferences, characteristics, and behaviors).

We will not collect additional categories of Personal Information or use collected Personal Information for materially different, unrelated, or incompatible purposes without providing you notice.

2. COOKIES AND WEB TECHNOLOGIES

Our Site use cookies and other web technologies to collect and store certain information when you visit or use the Site.

A cookie is a small file consisting of letters and numbers. This file uniquely identifies and recognizes your browser or device and transmits information to the server. Some of these cookies are placed by us (i.e., first-party cookies) and others are placed by third parties (i.e., third party cookies). We use the following cookies on our Site:

- *Strictly Necessary/ or Essential Cookies:* These cookies are essential to the basic operation of our Site. They help identify you when you sign in, remember the information you input in an online form or shopping cart, enable you to navigate around our Websites, use its features, or provide you with services you have requested. Without these cookies, we may be unable to provide the Site or certain services or features.
- *Performance/Analytics Cookies:* These cookies gather information on your use of our Site. For example, how you interact with the Site so we can improve it and whether the Site is working properly. Some of these cookies may be analytics cookies set by companies that analyze how you use our Site in order to help us improve and optimize our Site and the products and services we offer.
- *Functionality/Personalization Cookies:* These cookies help save information you have entered so the Site can recognize you, remember your username, remember your choices such as font size and color or language, or personalize Site content when you return. The information these cookies collect may be anonymized and set by us or by a third party.
- *Advertising/ or Targeting Cookies:* These cookies help us provide relevant advertising to you, measure its effectiveness, or limit the number of times you have seen it. They may record your visit to our Site including the links you follow to other sites so we can tailor our Site, communications, and advertising or remember whether you have visited the Site before. These technologies may also collect information including details about the device you use to access the Site (e.g., your computer or mobile phone), your IP address, browser type and operating system.

Some of these cookies may follow you when you leave the Site and travel to other websites so that we can serve personalized ads targeted to your preferences. We may place some of these cookies on your device or third parties may place them when you visit the Site to serve advertisements (banners or links) on our behalf across the Internet. These advertising companies use tracking technologies (including cookies and pixel tags) to collect information about your visits to our Site and your interactions with our products in order to provide tailored advertisements based on your interests and browsing of our Site.

Our Site also uses

- *Pixels.* These small electronic files, also known as pixels, are set by us or third parties, help with functions such as tracking, analytics, counting Site visitors or for related marketing and media services including targeted ads. These pixels may collect your email, name, order items and ID, page ID, quantity, unit price, size, and product ID. This data is aggregated and anonymized.
- *Email pixel tracking.* We may embed email pixels in emails we send you. When you open the email, it sends back information. These pixels help us determine information including how many people open our emails, click on links, the percentage of recipients who read email on their phones, etc. We use this information for marketing purposes and to learn more about our audience.
- *Facebook meta pixel.* This pixel is used for analytics, tracking and serving targeted ads. It tracks information such as your page view, view content, search, add to cart, purchase information, sign

up, download, submit form, or user information (IP address, browser information). This data is aggregated and anonymized.

- *URL trackers.* These third party trackers are strings of code that track user behavior after clicking on a URL for analytics and marketing purposes. This data is aggregated and does not collect data on individuals.
- *Browser/device/online fingerprinting.* These tools use scripts to track the attributes of the visitor's device or browser and IP address to build a profile of the user.
- *Chatbot.* Our website uses chatbots which are operated by humans and not bots to help process and respond to user questions. The chatbots help with customer service, analytics and tracking. The user's interaction with the chatbot is recorded and used for customer relations management history. A third party helps operate these bots for us, including storing and processing the information collected through the bots.
- *Session replay.* We may use web technology tools to record you interaction with the Site for tracking and to help us analyze and understand how the Site is utilized by visitors. These tools may record information such as your clicks, scrolls and mouse movements, feedback polls, country, duration, device, name, email, ID, browser, OS, and IP address. A third party helps operate these tools for us, including storing and processing the information collected through the tools.
- *Social media widgets.* Our Site includes social media features, such as the Facebook, X, Instagram, TikTok and LinkedIn widgets. These features may collect information about you such as your IP address and which pages you visit on our Site. They may set a cookie or employ other tracking technologies to accomplish this. Social media features and widgets may be hosted by a third party. Your interactions with those features are governed by the privacy policies of the companies that provide them.
- *Analytics.* Our Site uses analytics tools to help us analyze utilization of the Site, track users, help with activities such as remarketing, audience or customer match. These tools collect user information (e.g., IP address, browser information, page views), shares, conversions, demographic and interest information.
- *reCAPTCHA.* Our Site uses the reCaptcha tool for security purposes. Please see its privacy policy for more information.

When you visit our Site, register, or open an email, our online data partners or vendors may use cookies, ad beacons, and similar technologies to associate these activities with information they or others have about you, including your email address. We (or service providers on behalf) may then send communications and marketing to these email addresses. You can unsubscribe by following the directions in the communication.

Exercising Choice. Most browsers allow you to block or refuse cookies. The Help Menu on the menu bar of many browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, and how to disable cookies altogether. If you do so, you may need to adjust your preferences manually each time you visit a website. Please note that if you

block certain cookies, some of the services and functionalities of our Site may not work and you may be required to re-enter any user IDs and passwords more frequently.

You can limit our sharing of certain types of information, known as Customer Proprietary Network Information (“CPNI”), for certain marketing uses. You can monitor or limit information that is shared by setting alerts, clearing the cache manually, or disabling cookies entirely.

See Section 7 for additional choices for exercising control over your information and how to limit the ways we send marketing offers to you.

3. BROWSER-BASED DO NOT TRACK

Some browsers incorporate a “Do Not Track” (DNT) feature. When turned on, the feature signals to websites and online services that you do not want to be tracked. We track Websites users over time and across third-party websites; however, because there is no currently accepted standard for responding to a DNT signal, we do not respond to DNT signals on our Site where we provide advertisements, content, or other services.

To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

4. SOURCES

You. We may collect and store information that you voluntarily provide to us through the Site, during visits to our stores, through our customer service representatives, at events, through marketing efforts including contests, sweepstakes, or any other way we interact with you including if you submit a job application or are employed by us.

Social media and related services or websites. We may collect information about you through your social media services consistent with your settings on such services or from publicly available websites consistent with their terms and conditions. If you create an account or access our Site using credentials from a third-party social media platform (e.g., Facebook), we have access to certain information from that platform, such as your name, email address, friends list and public profile information, in accordance with the authorization procedures determined by that platform.

Third Parties. As noted above, we may collect information about you from third parties that are lawfully entitled to share your Personal Information with us such as our subsidiaries, related entities and affiliates; service providers and contractors; your family and friends; our business partners; marketing and advertising companies; vendor partners; your references, etc. We may combine or link information we receive from third parties with information we have about you.

Inferences. We may use or combine Personal Information that you provide, that we collect automatically, or that we obtain from other sources to derive or infer additional Personal Information about you. For example, we may infer that you are looking to purchase a new device or services based on your website browsing behavior and past purchases, or we may use your IP address to estimate your general location.

Information Collected Automatically. As noted in Section 2, when you navigate through and interact with our Site, we may compile statistical information concerning your usage of the Site through third-party analytics services. To do so, we may collect information about your equipment, browsing actions, patterns of traffic flowing through the Site, sites that refer visitors to the Site, pages of the Site that visitors use as entry and exit points, browser and operating systems and versions used by visitors to the Site, etc. Analytics providers may transfer this information to third parties in case of a legal obligation or if a third-party processes data on behalf of that service.

When you visit our Site or open an email, our online data partners or vendors may use cookies, ad beacons, and similar technologies to associate these activities with information they or others have about you, including your email address and share it with us.

For additional information on data collected automatically from you, please see Section 2.

Store Cameras and audio recordings. We may collect Personal Information through cameras located in and around our stores. We use this information for operational purposes such as measuring traffic patterns, tracking in-stock levels, as well as for fraud and theft prevention and security. We may also record your call to customer services for customer service management and quality control purposes.

5. HOW WE USE YOUR PERSONAL INFORMATION

In general, we use the Personal Information we collect only for the purpose it was collected, for compatible purposes, as permitted or required by law, as necessary to carry out our contractual duties and obligations, and as otherwise provided in this Policy. For example, we may use your Personal Information in the following ways:

- To communicate with you including to fulfill or meet the reason you provided the information (e.g., a quote), respond to your comments, questions and requests for information; provide customer service; send you technical notices, updates, security alerts, support and administrative messages; send you confirmations, receipts, invoices, marketing messages; provide information related to insurance or warranty coverage.
- To provide and deliver products and services; process your payments, transactions and returns; for purposes related to warranties and repairs; to prevent transactional fraud. We may also save your information to facilitate new product orders or process returns.
- To provide technical support (including, but not limited to, troubleshooting).
- Engage in advertising, promotional, and marketing activities; to deliver content and product and service offerings relevant to your interests including targeted offers and ads through our Site, third-party websites, and via email, phone or text message (with your consent, where required by law). For example, we may create look alike audiences, remarket, and retarget ads; tailor content and information we send or display to you; offer location customization and personalized recommendations, help, and instructions; personalize your experience including linking or combining with other information we receive from third parties to help understand your preferences; or administer promotions, sweepstakes, gift card services.

- Verify or enforce compliance with the Terms of Use and policies that govern our Site and services.
- To administer the Site; provide support, personalize your Site experience, analyze Site usage, and develop our Site and services.
- To create, maintain, customize, and secure your customer profile.
- To conduct research and development; monitor and analyze trends, usage and activities relating to the Site and its functionality, in-store activity, purchases, and experiences.
- For other everyday business purposes (e.g., financial account management, product development, contract management, IT and website administration, corporate governance, record keeping, reporting and legal compliance, internal investigations, quality control and monitoring customer service response).
- To prevent, detect, and investigate fraud and other suspected illegal activities; protect the rights, property, security, and safety of Victra, our Site, our employees, customers and others.
- To investigate claims or allegations; establish, exercise or defend a legal claim; enforce our rights arising from any contracts entered between you and us including billing and collection; to respond to law enforcement requests and as required by applicable law or court order; and for other lawful processes or public safety purposes.
- To process your application for employment with us or manage the employment relationship.
- To provide ADA requested accommodations.
- To comply with legal and regulatory obligations (e.g., certain laws and regulations may require us to process your Personal Information. For example, we may collect your age to comply with laws applicable to the collection and disclosure of Personal Information belonging to minors.
- 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 is among the assets transferred.
- To fulfill any other purpose for which you provide it.

6. DISCLOSURE AND SALE OF PERSONAL INFORMATION

In general, we will not disclose your Personal Information except with your consent and as described in this Policy unless otherwise permitted or required by law. We do not sell your Personal Information unless otherwise noted in a state specific notice in section 17. If we sell your Personal Information, it is for the purposes that we may use it, as described in this Policy.

To carry out such purposes, we may disclose your Personal Information to

- Our related entities or affiliates. (e.g., for assistance with our or their advertising or marketing).

- Service providers and contractors who collect or process information on our behalf (e.g., to help us offer, provide, repair, and bill for products and services, for Site operation or hosting, fulfillment services, payment authorization and processing, email services, HR management, tax reporting, security, fraud protection and credit risk reduction, product customization, marketing and promotional services including material distribution, website evaluation, website analytics including session recording services, chatbot services, biometric data collection services, IT services, cloud storage, background checks, benefits administration). These third parties are not authorized to use or disclose Personal Information you provide to us on or through the Site for any purpose other than to perform the services designated by us.
- Third party marketing companies that assist us with creating marketing profiles, delivering targeted ads, etc.
- Business partners (e.g., as part of promotions or events).
- Manufacturers and others related to repairs and warranty coverage.
- Third parties and vendors (e.g., advertising and marketing vendors; financing; credit companies and collection agencies).
- Professional advisors (e.g., lawyers, accountants, auditors, bankers, insurers).
- Social networks.

We may disclose your Personal Information to third parties as necessary

- When needed by outside auditors and regulators.
- To comply with federal, state, or local laws.
- To comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities.
- To cooperate with law enforcement agencies concerning conduct or activity that we reasonably and in good faith believe may violate federal, state, or local laws.
- To protect you, others, or us.
- To investigate allegations or claims and establish, exercise or defend legal claims.
- In connection with a merger or sale involving all or part of our Websites or as part of a corporate reorganization, stock sale or other change of control. Personal Information that we have collected about may be disclosed to such entity as part of the due diligence process and will be transferred to such entity as one of the transferred assets.

We share de-identified information with companies to assist with the delivery of advertising campaigns or aggregate reports.

We will also disclose your Personal Information to third parties at your direction.

The following chart describes the categories of Personal Information we may collect or may have collected about you, the categories of third parties to whom we may disclose or may have disclosed Personal Information, and the categories of third parties to whom we may “sell”/”share” or may have sold/shared (as those terms are defined by the applicable state consumer data protection law) your Personal Information in the preceding twelve (12) months.

Categories of Personal Information We May Collect or Have Collected	Categories of Parties to Whom We May Disclose or Have Disclosed	Categories of Parties to Whom We May Sell/Share of Have Sold/Shared
<p><i>Identifiers and other contact information</i> (e.g., name, e-mail, telephone number, mailing address, date of birth, account username and password, IP address, online identifier, device Identifier, SSN, driver’s license, signature, education, photo, employment history, bank account or credit card number). Note that some of this information may overlap with other categories of Personal Information such as Sensitive Information.</p>	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Vendors, contractors and service providers. ● Business partners. ● Manufacturers and others related to warranty coverage. ● Third parties as required by law or administrative orders and similar disclosures. ● Third parties in connection with a merger, divestiture, sale, or asset transfer. ● Third-party links and widgets (e.g., social media widgets). ● Governmental entities including law enforcement. ● Professional advisors such as accountants and lawyers. ● Other third parties as directed by you. 	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Business or promotional partners. ● Advertising and marketing companies. ● Successors to all or portions of our business. ● Third parties in connection with a merger, divestiture, sale, or asset transfer.
<p><i>Characteristics of protected classifications under California or federal law</i> (e.g., race, religion, age, military veteran status, disability). Note that some of this</p>	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Vendors, contractors and service providers. ● Business partners 	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Business or promotional partners.

<p>information may overlap with other categories of Personal Information such as Sensitive Information.</p>	<ul style="list-style-type: none"> ● Third parties as required by law or administrative orders and similar disclosures. ● Third parties in connection with a merger, divestiture, sale, or asset transfer. ● Third-party links and widgets (e.g., social media widgets). ● Governmental entities including law enforcement. ● Professional advisors such as accountants and lawyers. ● Other third parties as directed by you. 	<ul style="list-style-type: none"> ● Advertising and marketing companies. ● Successors to all or portions of our business. ● Third parties in connection with a merger, divestiture, sale, or asset transfer.
<p><i>Commercial Information</i> (e.g., records of products or services purchased, obtained, or considered, or other purchasing histories or tendencies). Note that some of this information may overlap with other categories of Personal Information.</p>	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Vendors, contractors and service providers. ● Manufacturers and others related to warranty coverage. ● Business partners ● Third parties as required by law or administrative orders and similar disclosures. ● Third parties in connection with a merger, divestiture, sale, or asset transfer. ● Third-party links and widgets (e.g., social media widgets). ● Governmental entities including law enforcement. ● Professional advisors such as accountants and lawyers. 	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Business or promotional partners. ● Advertising and marketing companies. ● Successors to all or portions of our business. ● Third parties in connection with a merger, divestiture, sale, or asset transfer.

	<ul style="list-style-type: none"> ● Other third parties as directed by you. 	
<p><i>Education</i> (e.g., information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act), <i>Employment or Other Professional Information</i> (e.g., information on your resume or job application; collected while managing the employment relationship or created during your relationship with us). Note that some of this information may overlap with other categories of Personal Information.</p>	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Vendors, contractors and service providers. ● Business partners ● Third parties as required by law or administrative orders and similar disclosures. ● Third parties in connection with a merger, divestiture, sale, or asset transfer. ● Third-party links and widgets (e.g., social media widgets). ● Governmental entities including law enforcement. ● Professional advisors such as accountants and lawyers. ● Other third parties as directed by you. 	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Business or promotional partners. ● Advertising and marketing companies. ● Successors to all or portions of our business. ● Third parties in connection with a merger, divestiture, sale, or asset transfer.

<p><i>Internet or Other Similar Network Activity</i> (e.g., browsing history, search history, information on your interaction with our Websites, chat history/logs, chat recordings or transcriptions, search history, your interaction an ad or an email from us). Note that some of this information may overlap with other categories of Personal Information.</p>	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Vendors, contractors and service providers. ● Business partners ● Third parties as required by law or administrative orders and similar disclosures. ● Third parties in connection with a merger, divestiture, sale, or asset transfer. ● Third-party links and widgets (e.g., social media widgets). ● Governmental entities including law enforcement. ● Professional advisors such as accountants and lawyers. ● Other third parties as directed by you. 	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Business or promotional partners. ● Advertising and marketing companies. ● Successors to all or portions of our business. ● Third parties in connection with a merger, divestiture, sale, or asset transfer.
<p><i>Geolocation data</i> (e.g., location information while using one of our apps or Websites). If we collect precise geolocation, this is also considered Sensitive Information.</p>	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Vendors, contractors and service providers. ● Business partners ● Third parties as required by law or administrative orders and similar disclosures. ● Third parties in connection with a merger, divestiture, sale, or asset transfer. ● Third-party links and widgets (e.g., social media widgets). ● Governmental entities including law enforcement. 	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Business or promotional partners. ● Advertising and marketing companies. ● Successors to all or portions of our business. ● Third parties in connection with a merger, divestiture, sale, or asset transfer.

	<ul style="list-style-type: none"> ● Professional advisors such as accountants and lawyers. ● Other third parties as directed by you. 	
<p><i>Audio, electronic, visual or similar information</i> (e.g., identifiable information obtained from voicemail messages, while speaking with our service representatives, including on the telephone or through the chat feature on the Websites, and information captured by video cameras). Note that some of this information may overlap with other categories of Personal Information.</p>	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Vendors, contractors and service providers. ● Business partners ● Third parties as required by law or administrative orders and similar disclosures. ● Third parties in connection with a merger, divestiture, sale, or asset transfer. ● Third-party links and widgets (e.g., social media widgets). ● Governmental entities including law enforcement. ● Professional advisors such as accountants and lawyers. ● Other third parties as directed by you. 	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Business or promotional partners. ● Advertising and marketing companies. ● Successors to all or portions of our business. ● Third parties in connection with a merger, divestiture, sale, or asset transfer.
<p><i>Biometric Information</i> (e.g., an individual’s physiological, biological, or behavioral characteristics used or is intended to be used singly or in combination with each other or with other identifying data, to establish individual identity). Note that biometric information also</p>	<ul style="list-style-type: none"> ● Vendors, contractors and service providers. ● Third parties as required by law or administrative orders and similar disclosures. ● Other third parties as directed by you. 	<p>n/a</p>

constitutes Sensitive Information.		
<p><i>Sensitive Information</i> (e.g., Social Security, driver’s license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin; religious or philosophical beliefs; union membership; the contents of a consumer’s mail, email, and text messages unless the business is the intended recipient of the communication; genetic data; biometric information processed to identify a consumer; information processed to analyze a consumer’s health; information processed to analyze a consumer’s sex life or sexual orientation; data related to citizenship or immigration status; data relating to a minor child.)</p>	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Vendors, contractors and service providers. ● Business partners ● Third parties as required by law or administrative orders and similar disclosures. ● Third parties in connection with a merger, divestiture, sale, or asset transfer. ● Third-party links and widgets (e.g., social media widgets). ● Governmental entities including law enforcement. ● Professional advisors such as accountants and lawyers. ● Other third parties as directed by you. 	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Business or promotional partners. ● Advertising and marketing companies. ● Successors to all or portions of our business. ● Third parties in connection with a merger, divestiture, sale, or asset transfer.
<p><i>Inferences Draw from Personal Information</i> (i.e., inferences drawn from any of the information above to create a profile reflecting your preferences, characteristics, and behaviors).</p>	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Vendors, contractors and service providers. ● Business partners ● Third parties as required by law or administrative orders and similar disclosures. 	<ul style="list-style-type: none"> ● Affiliates and related entities. ● Business or promotional partners. ● Advertising and marketing companies. ● Successors to all or portions of our business.

	<ul style="list-style-type: none"> • Third parties in connection with a merger, divestiture, sale, or asset transfer. • Third-party links and widgets (e.g., social media widgets). • Governmental entities including law enforcement. • Professional advisors such as accountants and lawyers. • Other third parties as directed by you. 	<ul style="list-style-type: none"> • Third parties in connection with a merger, divestiture, sale, or asset transfer.
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7. YOUR CHOICES AND OPT-OUT PROCEDURES

You can limit the ways we send marketing offers to you by taking the following actions:

- Telemarketing: Opt out of marketing-related calls by sending a written request to consumerprivacy@victra.com. Please note that it can take up to 30 days to remove you from existing marketing campaigns.
- Emails: Opt out of receiving marketing-related emails by following the unsubscribe instructions at the bottom of marketing emails you receive.
- Text messages: Opt out of receiving marketing-related texts by following the unsubscribe instructions included in texts you receive.
- Postal mail: Opt out of receiving marketing-related mail by sending a written request to consumerprivacy@victra.com. Note that even if you unsubscribe, you could still receive mail when we use a bulk mailing service that delivers to all homes within a ZIP code.

Please note that removal of Personal Information from our database or unsubscribing will not stop marketing or advertising content that has already been generated for distribution or is otherwise queued for transmission to you prior before we can implement your request. If you opt out of receiving promotional communications, we may still send you non-promotional/transactional emails, such as emails about your purchases, account verification, or as otherwise consistent with applicable law.

Location Information. The settings of your Internet browser or mobile device may allow you to stop sharing your precise location with us or others.

Emails and Click-Through URLs. Some of our e-mail communications to you may include a “click-through URL” linked to a particular page on the Site. By clicking on one of these URLs, you will automatically enter our Site and we may collect information related to the “click-through.” To prevent having this information collected, do not click on URL links in our e-mail communications.

Mobile Push Notifications/Alerts. With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

Google Analytics Opt-Out Browser Add On. If you want to opt-out, download and install the add-on for your web browser. The Google Analytics opt-out add-on is designed to be compatible with Chrome, Safari, Firefox and Microsoft Edge. In order to function, the opt-out add-on must be able to load and execute properly on your browser. Learn more about the opt-out and how to properly install the browser add-on [here](#). You can also visit the following URL to learn more about how to manage Google from using your user analytics. <https://tools.google.com/dlpage/gaoptout>

Facebook Usage Tool and Steps to Deactivate. Click [here](#) for more information on the Facebook tool and how to deactivate it.

8. EXTERNAL LINKS AND THIRD-PARTY INTEGRATIONS

Our Site contain links to websites or resources outside of our Site for your informational purposes only. We may also provide links to third-party integrations. Third-party integrations are websites or platforms that synchronize with our Site to provide you with additional functionality, tools, or services such as maps, sending requested information, etc. You acknowledge and agree we are not responsible for the availability of third-party sites, resources, or integrations and do not endorse and are not responsible or liable for any content, advertising, goods, services, or other materials on, available through, or provided by such sites, resources, or integrations. We are not responsible for the privacy or other practices of such sites and cannot guarantee the security of Personal Information that you provide, or is collected by, such sites. We encourage you to review the privacy policies and terms and conditions of any site you visit via a link from our Site.

9. EMBEDDED CONTENT

The Site contains embedded content (e.g., videos). Embedded content may place third-party cookies on your device that track your online activity to enhance your experience or assess the success of their application. We have no direct control over the information these cookies collect, and you should refer to their website privacy policy for additional information.

10. CHANGES TO YOUR ACCOUNT INFORMATION

You may update or correct your information by calling Customer Service at 1-800-279-3550 or emailing us at wecare@victra.com. Please note that we may retain information about you for legitimate business purposes or as required by law.

11. HOW LONG WE RETAIN YOUR INFORMATION.

We will retain your Personal Information for as long as needed to provide services to you (for example, to honor a warranty or as needed to fulfill our own obligations). We may also retain your Personal Information for longer if it is necessary for legitimate business purposes including to satisfy legal or reporting obligations, resolve disputes, collect fees, improve our services or maintain security, comply with regulatory requirements, etc., or as permitted or required by applicable law. To determine the appropriate retention period for your Personal Information, we consider various factors such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we process your Personal Information; applicable legal requirements.

12. HOW WE PROTECT THE INFORMATION THAT WE COLLECT

We use technical, administrative, and physical safeguards to help protect against unauthorized access to, use, or disclosure of information we collect or store. In addition, we train our employees on the importance of privacy, security, and the proper ways to access, use and disclose personal information. Our practices and policies prohibit employees with whom we share this information from using Personal Information unless they are authorized to do so and have a business need.

Unfortunately, no data transmission over the Internet or any wireless network is 100% secure. As a result, while we strive to take reasonable measures to protect your Personal Information, we cannot ensure, guarantee or warrant the security of any information you transmit, and you do so at your own risk.

When we collect your Personal Information, it may be transferred to our servers in other jurisdictions, including the United States, which may not have similar data protection laws to the country in which you reside.

13. CHILDREN'S PRIVACY

Our Websites are not intended for children under 13 years of age. We do not knowingly collect Personal Information from children under 13. No one under age 13 may provide any Personal Information on the Website. If you are under 13, do not use or provide any information on our Website. If you believe we might have any information from or about a child under 13, please contact us at consumerprivacy@victra.com. If we learn we have collected or received Personal Information from a child under 13 without verification of parental consent, we will delete that information.

14. APPLICABLE LAW

This Policy is governed by the internal substantive laws of North Carolina without regard to its conflict of laws principles. Jurisdiction for any claims arising under or out of this Policy shall lie exclusively with the state and federal courts within North Carolina. If any provision of this Policy is found to be invalid by a court having competent jurisdiction, the invalidity of such provision shall not affect the validity of the remaining provisions of this Policy, which shall remain in full force and effect.

15. CONTACT US

If you have questions concerning this Privacy Policy or the Site, you may contact us at consumerprivacy@victra.com.

16. STATE SPECIFIC NOTICES: CALIFORNIA, COLORADO, CONNECTICUT, NEVADA, OREGON, VIRGINIA AND UTAH

If you are a resident of California, Colorado, Connecticut, Nevada, Oregon, Virginia or Utah, the following state specific provisions describe our policies and practices in accordance with the applicable state consumer data protection law regarding the collection, use, and disclosure of Personal Information that we obtain about you when you access or use the Site, our mobile application, use our services or through other channels (e.g., phone and e-mail conversations, viewing our emails, when you visit our locations or attend our events, or through authorized services providers or third parties).

Capitalized terms used in the following state sections shall have the meanings set forth in the applicable state consumer data protection law. Sections 1 through 15 of this Policy continue to apply except as modified by the state section applicable to you. Please read the relevant state section carefully before using the Site or otherwise submitting your Personal Information to us.

Except as otherwise noted, any capitalized terms not defined in a state-specific section have the meaning set forth in the Policy and Terms of Use. *With the exception of the California section, these state sections do not apply to Personal Information we obtain about you in a commercial or employment context.*

By accessing or using the Site or otherwise submitting Personal Information to us, you indicate your understanding that the collection, use, and sharing of your information is subject to the terms of the relevant state section, the Privacy Policy, and our Terms of Use. If you do not consent to the collection, use, and sharing of your Personal Information as described, please do not use the Site or otherwise provide us with such information.

Consumer Rights. These state-specific sections include rights you may have under the applicable state law and information on how to exercise them. Where permitted by law, we reserve the right to respond only to a verifiable request to exercise a right. A verifiable request may be made by any of the following:

- the Consumer who is the subject of the request,
- a Consumer on behalf of the consumer's minor child, or
- a natural person or person registered with the Secretary of State authorized to act on behalf of a Consumer, where permitted by applicable law.

If we request, you must provide sufficient information to verify your identity and/or authority to act on behalf of a Consumer. In general, we may ask you to provide identifying information that we already maintain about you or we may use a third-party verification service. In either event, we will try to avoid asking you for sensitive Personal Information to verify your identity. We may not be able to respond to your request if we cannot verify your identity or authority to make the request and/or confirm the Personal Information relates to you. Please note that making a Consumer request does not require you to create an account with us.

Additionally, you will need to describe your request with sufficient detail to allow us to review, understand, assess, and respond. We will not use the Personal Information we collect from an individual to determine a verifiable request for any other purpose, except as required by law.

Fees. We reserve the right to charge a fee to process or respond to your request if it is excessive, repetitive, or manifestly unfounded. If we determine that a request warrants a fee, we will attempt to notify you as to why we made that decision and provide a cost estimate before completing your request. We will attempt to respond to a verifiable consumer request within forty-five (45) days of receipt, but we may require up to ninety (90) days to respond, under which circumstances we will notify you of the need for an extension.

Response. 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 the receipt of your verifiable consumer request.

- *California residents:* With respect to Personal Information collected on and after January 1, 2022, and to the extent expressly permitted by applicable regulation, you may request that such disclosures cover a period beyond the 12 months referenced above, provided doing so would not be impossible or require a disproportionate effort by us.

Agents. Subject to certain limitations, you may authorize a natural person or a business registered with the applicable Secretary of State to act on your behalf with respect to exercising your rights under a state section. Unless you have provided the authorized agent with a qualifying power of attorney, you must provide your authorized agent with written permission (signed by you) to act on your behalf and verify their identity with us. We reserve the right to deny requests from persons or businesses claiming to be authorized agents that do not submit sufficient proof of their authorization. The following state-specific limitations apply to agents:

- *Colorado:* An agent may submit only a request to Opt Out of the processing of Personal Data concerning the Consumer for purposes of Targeted Advertising or the Sale of Personal Data.
- *Connecticut:* An agent may exercise only the right to Opt Out of processing of Personal Data concerning the Consumer for purposes of Targeted Advertising, the Sale of Personal Data, or Profiling in furtherance of solely automated decisions that produce legal or similarly significant effects concerning the consumer.
- *Oregon:* An agent may exercise only the right to Opt Out of processing of Personal Data concerning the Consumer for purposes of Targeted Advertising, the Sale of Personal Data, or Profiling.

A. California

“Shine the Light Law”. If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your Personal Information by us to third parties for the third parties’ direct marketing purposes. Requests may be made one time per calendar year. If applicable, this information would include the categories of customer information and the names and addresses of

those businesses with which we shared customer information for the immediately prior calendar year (e.g., requests made in 2023 will receive information regarding 2022 sharing activities). You may submit your request using the contact information at the end of this Policy.

California Consumer Privacy Act, as amended (“CCPA”). The following CCPA section supplements and amends the Policy to disclose information about our data processing practices as required by the California Consumer Privacy Act of 2018 (“CCPA”). This CCPA Section applies solely to individuals who are residents of the State of California (“Consumers” or “you”).

- I. Personal Information.** Please note that under the CCPA, Personal Information does not include:
- a. Publicly available information from government records.
 - b. Deidentified or aggregated Consumer information.
 - c. Information excluded from the CCPA’s scope, such as certain health or medical information and other categories of information protected by different laws

II. Financial Incentives.

From time to time, we may offer coupons, discounts, and other promotions whether online or in stores, in exchange for voluntarily providing us with your email address and or cell phone number (“Incentive Programs”). No purchase is necessary to participate. We use the information you provide in accordance with our Privacy Policy.

All Incentive Programs are provided to you in exchange for the value of your Personal Information to the Company. We use the Personal Information we collect from the Incentive Programs for lead capture, marketing, research, and product development purposes. The financial incentive we provide in exchange for your Personal Information (e.g., discounts, special offers) is reasonably related to the value of your Personal Information to us. We calculate this value by determining the approximate return on purchases, the expenses involved in providing the discounts or special offers and the expenses involved in offering and administering these activities and opportunities. You must opt in to participate in an Incentive Program. *By opting into to the opportunities listed above or enrolling in the Program, you authorize us, our affiliates, and partners to send marketing communications to you.* You can withdraw from an Incentive Program at any time by following the unsubscribe/opt-out button in communications sent to you.

III. Your Consumer Rights and How to Exercise Them.

The CCPA provides California Consumers with the following rights, subject to certain exceptions:

The Right to Opt Out of the Sale or Sharing of Your Personal Information. In certain circumstances, we Sell or Share your Personal Information. To Opt Out of the Sale or Sharing of your Personal Information, please click here: **Do Not Sell or Share My Personal Information.**

This Site also recognizes and processes opt-out preference signals that indicate your intent to opt out of the Sale or Sharing of your Personal Information.

We do not have actual knowledge that we have Sold the Personal Information of minors under the age of 16 years.

Sensitive Personal Information. We do not use or disclose your Sensitive Personal Information for purposes that, with limited exceptions, are not necessary to provide our products and services as are reasonably expected by an average Consumer requesting those goods and services.

Additional Rights:

- a. *Right to Know.* You have the right to request that we disclose the following to you as it relates to the 12-month period preceding the Company’s receipt of your request:
 - i. The categories of Personal Information we have collected about you.
 - ii. The categories of sources from which the Personal Information was collected.
 - iii. The business or commercial purpose for collecting, Selling, or sharing Personal Information.
 - iv. The categories of Personal Information we disclosed or Sold for a business purpose.
 - v. The categories of third parties we disclosed Personal Information to, by the category of Personal Information.
 - vi. The specific pieces of Personal Information we collected about you.
- b. *Right to Request Correction of Your Personal Information.* You have the right to request that we correct any inaccurate Personal Information we maintain about you.
- c. *Right To Request Deletion of Your Personal Information.* You have the right to request that we delete Personal Information we collected or maintain about you. Upon receipt of a verifiable request and as required by the CCPA, we will delete and direct any Service Providers, Contractors, and Third Parties to delete your PI from their records.

To submit a California Consumer Rights request to Know, Delete or Correct, please contact us at consumerprivacy@victra.com or 1-800-279-3550.

We will not discriminate against you for exercising any of your CCPA rights. For example, we generally will not provide you a different level or quality of goods or services if you exercise your rights under the CCPA.

B. COLORADO RESIDENTS

The following Colorado section supplements and amends the Policy to disclose information about our data processing practices and your rights as required by the Colorado Privacy Act (“CPA”). This CPA section applies solely to individuals who are residents of the State of Colorado (“Consumer” or “you”).

I. Purposes for Which We May Collect and Process Your Personal Data.

Categories PI	Purposes for Which We May Collect and Process Your Personal Data
<i>Identifiers and other contact information such as name, e-mail, telephone number, mailing</i>	<ul style="list-style-type: none">• Communicate with you by phone, email, or text message.

address, date of birth, account username and password, IP address, online identifier, device Identifier, SSN, driver's license, signature, education, photo, employment history, bank account or credit card number.

- Provide, operate, monitor, analyze, and improve our Site, services, products, programs, events and experiences including managing your account, hosting forums and interactive areas of our Site and services.
- Provide and deliver products, services, and information; process payments, transactions and returns; send you related information including confirmations, receipts, invoices, customer experience surveys, and recall notices; provide warranty coverage.
- Provide technical support (including to debug and troubleshoot), and send you technical notices, updates, security alerts, and support and administrative messages.
- Prevent, detect, and investigate fraud and other suspected illegal activities; protect the rights, property, security, and safety of Victra, our subsidiaries and affiliates, our employees, customers and others.
- Engage in advertising, promotional, and marketing activities including creating look alike audiences, remarketing, retargeting, planning or hosting events.
- Send communications about our, and our subsidiaries', affiliates' and partners' products, services, offers, contests, promotions, sweepstakes, surveys and customer experience research, news, events, outings, and trips, and other information we think will be of interest to you (for information about how to manage promotional communications, please see "Opt-Out Procedures" below).
- Tailor content and information we send or display to you; offer location customization and personalized recommendations, help, and instructions; and otherwise personalize your experience while using our Sites or Services including linking or combining with other information we receive from third

parties to help understand your preferences and provide you with personalized service.

- Administer and promote contests, promotions, sweepstakes, gift card services, and Incentive Programs.
- Verify or enforce compliance with the terms of use and policies that govern our Sites and services.
- Update, maintain, use, and analyze our records.
- Research and development; monitor and analyze trends, usage and activities relating to the Site, in-store activity, purchases, and experiences.
- Administer, develop, and improve our Site, services, stores and experiences.
- For other everyday business purposes (e.g., financial account management, product development, contract management, IT and website administration, corporate governance, record keeping, reporting and legal compliance, internal investigations).
- To protect the rights, property, security, and safety of job applicants, employees, customers, the public and our company assets including facilities and information systems.
- To investigate claims or allegations; establish, exercise or defend a legal claim; enforce our rights arising from any contracts entered between you and us including billing and collection.
- To assess your application for employment with us or manage the employment relationship.
- Provide ADA requested accommodations.
- Comply with legal and regulatory obligations (e.g., certain laws and regulations may

	<p>require us to process your Personal Information. For example, we may collect your age to comply with laws applicable to the collection and disclosure of Personal Information belonging to minors. We may also use your Personal Information to respond to law enforcement requests, as required by applicable law, court order, or governmental regulations, and for other lawful processes or public safety purposes).</p> <ul style="list-style-type: none">• 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 is among the assets transferred.• To fulfill any other purpose for which you provide it.
<p><i>Gender, pregnancy, age, mental or physical disability, medical condition, military or veteran status.</i></p>	<ul style="list-style-type: none">• Communicate with you by phone, email, or text message.• Provide, operate, monitor, analyze, and improve our Site, services, products, programs, events and experiences including managing your account, hosting forums and interactive areas of our Site and services.• Provide and deliver products, services, and information; process payments, transactions and returns; send you related information including confirmations, receipts, invoices, customer experience surveys, and recall notices.• Provide technical support (including to debug and troubleshoot), and send you technical notices, updates, security alerts, and support and administrative messages.• Prevent, detect, and investigate fraud and other suspected illegal activities; protect the

rights, property, security, and safety of our, our subsidiaries and affiliates, our employees, customers and others.

- Engage in advertising, promotional, and marketing activities including creating look alike audiences, remarketing, retargeting, planning or hosting events.
- Send communications about our and our subsidiaries', affiliates' and partners' products, services, offers, contests, promotions, sweepstakes, surveys and customer experience research, news, events, outings, and trips, and other information we think will be of interest to you (for information about how to manage promotional communications, please see "Opt-Out Procedures" below).
- Tailor content and information we send or display to you; offer location customization and personalized recommendations, help, and instructions; and otherwise personalize your experience while using our Site or services including linking or combining with other information we receive from third parties to help understand your preferences and provide you with personalized service.
- Administer and promote contests, promotions, sweepstakes, gift card services, and Incentive Program.
- Verify or enforce compliance with the terms of use and policies that govern our Site and services.
- Update, maintain, use, and analyze our records.
- Research and development; monitor and analyze trends, usage and activities relating to the Site, in-store activity, purchases, and experiences.

	<ul style="list-style-type: none">• Administer, develop, and improve our Site, services, stores and experiences.• For other everyday business purposes (e.g., financial account management, product development, contract management, IT and website administration, corporate governance, record keeping, reporting and legal compliance, internal investigations).• To protect the rights, property, security, and safety of job applicants, employees, customers, the public and our company assets including facilities and information systems.• To investigate claims or allegations; establish, exercise or defend a legal claim; enforce our rights arising from any contracts entered between you and us including billing and collection.• To assess your application for employment with us or manage the employment relationship.• Provide ADA requested accommodations.• Comply with legal and regulatory obligations (e.g., certain laws and regulations may require us to process your Personal Information. For example, we may collect your age to comply with laws applicable to the collection and disclosure of Personal Information belonging to minors. We may also use your Personal Information to respond to law enforcement requests, as required by applicable law, court order, or governmental regulations, and for other lawful processes or public safety purposes).• 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
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	<p>proceeding, in which Personal Information held by us is among the assets transferred.</p> <ul style="list-style-type: none"> • To fulfill any other purpose for which you provide it.
<p><i>Commercial information such as services purchased, obtained, or considered or other purchasing or consuming histories or tendencies.</i></p>	<ul style="list-style-type: none"> • Communicate with you by phone, email, or text message. • Provide, operate, monitor, analyze, and improve our Site, services, products, programs, events and experiences including managing your account, hosting forums and interactive areas of our Site and services. • Provide and deliver products, services, and information; process payments, transactions and returns; send you related information including confirmations, receipts, invoices, customer experience surveys, and recall notices; provide warranty coverage. • Provide technical support (including to debug and troubleshoot), and send you technical notices, updates, security alerts, and support and administrative messages. • Prevent, detect, and investigate fraud and other suspected illegal activities; protect the rights, property, security, and safety of our, our subsidiaries and affiliates, our employees, customers and others. • Engage in advertising, promotional, and marketing activities including creating look alike audiences, remarketing, retargeting, planning or hosting events. • Send communications about our and our subsidiaries', affiliates' and partners' products, services, offers, contests, promotions, sweepstakes, surveys and customer experience research, news, events, outings, and trips, and other information we think will be of interest to you (for information about how to manage

promotional communications, please see "Opt-Out Procedures" below).

- Tailor content and information we send or display to you; offer location customization and personalized recommendations, help, and instructions; and otherwise personalize your experience while using our Site or services including linking or combining with other information we receive from third parties to help understand your preferences and provide you with personalized service.
- Administer and promote contests, promotions, sweepstakes, gift card services, and Incentive Programs.
- Verify or enforce compliance with the terms of use and policies that govern our Site and services.
- Update, maintain, use, and analyze our records.
- Research and development; monitor and analyze trends, usage and activities relating to the Site, in-store activity, purchases, and experiences.
- Administer, develop, and improve our Site, services, stores and experiences.
- For other everyday business purposes (e.g., financial account management, product development, contract management, IT and website administration, corporate governance, record keeping, reporting and legal compliance, internal investigations).
- To protect the rights, property, security, and safety of job applicants, employees, customers, the public and our company assets including facilities and information systems.
- To investigate claims or allegations; establish, exercise or defend a legal claim; enforce our rights arising from any contracts entered

	<p>between you and us including billing and collection.</p> <ul style="list-style-type: none"> • To assess your application for employment with us or manage the employment relationship. • Provide ADA requested accommodations. • Comply with legal and regulatory obligations (e.g., certain laws and regulations may require us to process your Personal Information. For example, we may collect your age to comply with laws applicable to the collection and disclosure of Personal Information belonging to minors. We may also use your Personal Information to respond to law enforcement requests, as required by applicable law, court order, or governmental regulations, and for other lawful processes or public safety purposes). • 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 is among the assets transferred. • To fulfill any other purpose for which you provide it.
<p><i>Education, Employment or Other Professional Information (e.g., information on your resume or job application; collected while managing the employment relationship or created during your relationship with us).</i></p>	<ul style="list-style-type: none"> • Communicate with you by phone, email, or text message. • Provide, operate, monitor, analyze, and improve our Site, services, products, programs, events and experiences including managing your account, hosting forums and interactive areas of our Site and services. • Provide and deliver products, services, and information; process payments, transactions and returns; send you related information including confirmations, receipts, invoices,

	<p>customer experience surveys, and recall notices.</p> <ul style="list-style-type: none">• Provide technical support (including to debug and troubleshoot), and send you technical notices, updates, security alerts, and support and administrative messages.• Prevent, detect, and investigate fraud and other suspected illegal activities; protect the rights, property, security, and safety of our, our subsidiaries and affiliates, our employees, customers and others.• Engage in advertising, promotional, and marketing activities including creating look alike audiences, remarketing, retargeting, planning or hosting events.• Send communications about our and our subsidiaries', affiliates' and partners' products, services, offers, contests, promotions, sweepstakes, surveys and customer experience research, news, events, outings, and trips, and other information we think will be of interest to you (for information about how to manage promotional communications, please see "Opt-Out Procedures" below).• Tailor content and information we send or display to you; offer location customization and personalized recommendations, help, and instructions; and otherwise personalize your experience while using our Site or services including linking or combining with other information we receive from third parties to help understand your preferences and provide you with personalized service.• Administer and promote contests, promotions, sweepstakes, gift card services, and Incentive Programs.
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	<ul style="list-style-type: none">• Verify or enforce compliance with the terms of use and policies that govern our Site and services.• Update, maintain, use, and analyze our records.• Research and development; monitor and analyze trends, usage and activities relating to the Site, in-store activity, purchases, and experiences.• Administer, develop, and improve our Site, services, stores and experiences.• For other everyday business purposes (e.g., financial account management, product development, contract management, IT and website administration, corporate governance, record keeping, reporting and legal compliance, internal investigations).• To protect the rights, property, security, and safety of job applicants, employees, customers, the public and our company assets including facilities and information systems.• To investigate claims or allegations; establish, exercise or defend a legal claim; enforce our rights arising from any contracts entered between you and us including billing and collection.• To assess your application for employment with us or manage the employment relationship.• Provide ADA requested accommodations.• Comply with legal and regulatory obligations (e.g., certain laws and regulations may require us to process your Personal Information. For example, we may collect your age to comply with laws applicable to the collection and disclosure of Personal Information belonging to minors. We may also use your Personal Information to
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	<p>respond to law enforcement requests, as required by applicable law, court order, or governmental regulations, and for other lawful processes or public safety purposes).</p> <ul style="list-style-type: none">• 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 is among the assets transferred.• To fulfill any other purpose for which you provide it.
<p><i>Internet or other electronic network activity such as browsing history, search history, information on your interaction with our Site, chat history/logs, chat recordings or transcriptions, search history, your interaction an ad or an email from us.</i></p>	<ul style="list-style-type: none">• Communicate with you by phone, email, or text message.• Provide, operate, monitor, analyze, and improve our Site, services, products, programs, events and experiences including managing your account, hosting forums and interactive areas of our Site and services.• Provide and deliver products, services, and information; process payments, transactions and returns; send you related information including confirmations, receipts, invoices, customer experience surveys, and recall notices.• Provide technical support (including to debug and troubleshoot), and send you technical notices, updates, security alerts, and support and administrative messages.• Prevent, detect, and investigate fraud and other suspected illegal activities; protect the rights, property, security, and safety of our, our subsidiaries and affiliates, our employees, customers and others.• Engage in advertising, promotional, and marketing activities including creating look

	<p>alike audiences, remarketing, retargeting, planning or hosting events.</p> <ul style="list-style-type: none">• Send communications about our and our subsidiaries', affiliates' and partners' products, services, offers, contests, promotions, sweepstakes, surveys and customer experience research, news, events, outings, and trips, and other information we think will be of interest to you (for information about how to manage promotional communications, please see "Opt-Out Procedures" below).• Tailor content and information we send or display to you; offer location customization and personalized recommendations, help, and instructions; and otherwise personalize your experience while using our Websites or Services including linking or combining with other information we receive from third parties to help understand your preferences and provide you with personalized service.• Administer and promote contests, promotions, sweepstakes, gift card services, and Incentive Programs.• Verify or enforce compliance with the terms of use and policies that govern our Site and services.• Update, maintain, use, and analyze our records.• Research and development; monitor and analyze trends, usage and activities relating to the Site, in-store activity, purchases, and experiences.• Administer, develop, and improve our Site, services, stores and experiences.• For other everyday business purposes (e.g., financial account management, product development, contract management, IT and website administration, corporate
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governance, record keeping, reporting and legal compliance, internal investigations).

- To protect the rights, property, security, and safety of job applicants, employees, customers, the public and our company assets including facilities and information systems.
- To investigate claims or allegations; establish, exercise or defend a legal claim; enforce our rights arising from any contracts entered between you and us including billing and collection.
- To assess your application for employment with us or manage the employment relationship.
- Provide ADA requested accommodations.
- Comply with legal and regulatory obligations (e.g., certain laws and regulations may require us to process your Personal Information. For example, we may collect your age to comply with laws applicable to the collection and disclosure of Personal Information belonging to minors. We may also use your Personal Information to respond to law enforcement requests, as required by applicable law, court order, or governmental regulations, and for other lawful processes or public safety purposes).
- 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 is among the assets transferred.
- To fulfill any other purpose for which you provide it.

Geolocation data such as location information while using one of our apps or Site.

- Communicate with you by phone, email, or text message.
- Provide, operate, monitor, analyze, and improve our Site, services, products, programs, events and experiences including managing your account, hosting forums and interactive areas of our Websites and Services.
- Provide and deliver products, services, and information; process payments, transactions and returns; send you related information including confirmations, receipts, invoices, customer experience surveys, and recall notices.
- Provide technical support (including to debug and troubleshoot), and send you technical notices, updates, security alerts, and support and administrative messages.
- Prevent, detect, and investigate fraud and other suspected illegal activities; protect the rights, property, security, and safety of our, our subsidiaries and affiliates, our employees, customers and others.
- Engage in advertising, promotional, and marketing activities including creating look alike audiences, remarketing, retargeting, planning or hosting events.
- Send communications about our and our subsidiaries', affiliates' and partners' products, services, offers, contests, promotions, sweepstakes, surveys and customer experience research, news, events, outings, and trips, and other information we think will be of interest to you (for information about how to manage promotional communications, please see "Opt-Out Procedures" below).
- Tailor content and information we send or display to you; offer location customization and personalized recommendations, help,

and instructions; and otherwise personalize your experience while using our Websites or Services including linking or combining with other information we receive from third parties to help understand your preferences and provide you with personalized service.

- Administer and promote contests, promotions, sweepstakes, gift card services, and Incentive Programs.
- Verify or enforce compliance with the terms of use and policies that govern our Site and services.
- Update, maintain, use, and analyze our records.
- Research and development; monitor and analyze trends, usage and activities relating to the Sites, in-store activity, purchases, and experiences.
- Administer, develop, and improve our Sites, services, stores and experiences.
- For other everyday business purposes (e.g., financial account management, product development, contract management, IT and website administration, corporate governance, record keeping, reporting and legal compliance, internal investigations).
- To protect the rights, property, security, and safety of job applicants, employees, customers, the public and our company assets including facilities and information systems.
- To investigate claims or allegations; establish, exercise or defend a legal claim; enforce our rights arising from any contracts entered between you and us including billing and collection.

	<ul style="list-style-type: none">• To assess your application for employment with us or manage the employment relationship.• Provide ADA requested accommodations.• Comply with legal and regulatory obligations (e.g., certain laws and regulations may require us to process your Personal Information. For example, we may collect your age to comply with laws applicable to the collection and disclosure of Personal Information belonging to minors. We may also use your Personal Information to respond to law enforcement requests, as required by applicable law, court order, or governmental regulations, and for other lawful processes or public safety purposes).• 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 is among the assets transferred.• To fulfill any other purpose for which you provide it.
<p><i>Audio, electronic, visual, thermal, or similar information such as identifiable information obtained from voicemail messages, while speaking with our service representatives, including on the telephone or through the chat feature on the Site, and information captured by video cameras.</i></p>	<ul style="list-style-type: none">• Communicate with you by phone, email, or text message.• Provide, operate, monitor, analyze, and improve our Site, services, products, programs, events and experiences including managing your account, hosting forums and interactive areas of our Site and services.• Provide and deliver products, services, and information; process payments, transactions and returns; send you related information including confirmations, receipts, invoices, customer experience surveys, and recall notices.

	<ul style="list-style-type: none">• Provide technical support (including to debug and troubleshoot), and send you technical notices, updates, security alerts, and support and administrative messages.• Prevent, detect, and investigate fraud and other suspected illegal activities; protect the rights, property, security, and safety of our, our subsidiaries and affiliates, our employees, customers and others.• Engage in advertising, promotional, and marketing activities including creating look alike audiences, remarketing, retargeting, planning or hosting events.• Send communications about our and our subsidiaries', affiliates' and partners' products, services, offers, contests, promotions, sweepstakes, surveys and customer experience research, news, events, outings, and trips, and other information we think will be of interest to you (for information about how to manage promotional communications, please see "Opt-Out Procedures" below).• Tailor content and information we send or display to you; offer location customization and personalized recommendations, help, and instructions; and otherwise personalize your experience while using our Site or services including linking or combining with other information we receive from third parties to help understand your preferences and provide you with personalized service.• Administer and promote contests, promotions, sweepstakes, gift card services, and Incentive Programs.• Verify or enforce compliance with the terms of use and policies that govern our Site and services.
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	<ul style="list-style-type: none">• Update, maintain, use, and analyze our records.• Research and development; monitor and analyze trends, usage and activities relating to the Site, in-store activity, purchases, and experiences.• Administer, develop, and improve our Site, services, stores and experiences.• For other everyday business purposes (e.g., financial account management, product development, contract management, IT and website administration, corporate governance, record keeping, reporting and legal compliance, internal investigations).• To protect the rights, property, security, and safety of job applicants, employees, customers, the public and our company assets including facilities and information systems.• To investigate claims or allegations; establish, exercise or defend a legal claim; enforce our rights arising from any contracts entered between you and us including billing and collection.• To assess your application for employment with us or manage the employment relationship.• Provide ADA requested accommodations.• Comply with legal and regulatory obligations (e.g., certain laws and regulations may require us to process your Personal Information. For example, we may collect your age to comply with laws applicable to the collection and disclosure of Personal Information belonging to minors. We may also use your Personal Information to respond to law enforcement requests, as required by applicable law, court order, or
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	<p>governmental regulations, and for other lawful processes or public safety purposes).</p> <ul style="list-style-type: none"> • 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 is among the assets transferred. • To fulfill any other purpose for which you provide it.
<p><i>Biometric information such as an individual's physiological, biological, or behavioral characteristics used or is intended to be used singly or in combination with each other or with other identifying data, to establish individual identity.</i></p>	<ul style="list-style-type: none"> • To identify you; for security and fraud prevention; to provide and operate our Services.
<p><i>Sensitive Data</i></p> <ul style="list-style-type: none"> • <i>mental/physical health condition or diagnosis</i> • <i>sex life or sexual orientation</i> • <i>citizenship or citizenship status</i> • <i>biometric data</i> • <i>personal data from a known child</i> 	<ul style="list-style-type: none"> • Communicate with you by phone, email, or text message. • Provide, operate, monitor, analyze, and improve our Site, services, products, programs, events and experiences including managing your account, hosting forums and interactive areas of our Site and services. • Provide and deliver products, services, and information; process payments, transactions and returns; send you related information including confirmations, receipts, invoices, customer experience surveys, and recall notices. • Provide technical support (including to debug and troubleshoot), and send you technical notices, updates, security alerts, and support and administrative messages. • Prevent, detect, and investigate fraud and other suspected illegal activities; protect the rights, property, security, and safety of Worldwide Golf Shops, our subsidiaries and

affiliates, our employees, customers and others.

- Engage in advertising, promotional, and marketing activities including creating look alike audiences, remarketing, retargeting, planning or hosting events.
- Send communications about our and our subsidiaries', affiliates' and partners' products, services, offers, contests, promotions, sweepstakes, surveys and customer experience research, news, events, outings, and trips, and other information we think will be of interest to you (for information about how to manage promotional communications, please see "Opt-Out Procedures" below).
- Tailor content and information we send or display to you; offer location customization and personalized recommendations, help, and instructions; and otherwise personalize your experience while using our Websites or Services including linking or combining with other information we receive from third parties to help understand your preferences and provide you with personalized service.
- Administer and promote contests, promotions, sweepstakes, gift card services, and Incentive Programs.
- Verify or enforce compliance with the terms of use and policies that govern our Site and services.
- Update, maintain, use, and analyze our records.
- Research and development; monitor and analyze trends, usage and activities relating to the Site, in-store activity, purchases, and experiences.
- Administer, develop, and improve our Site, services, stores and experiences.

	<ul style="list-style-type: none">• For other everyday business purposes (e.g., financial account management, product development, contract management, IT and website administration, corporate governance, record keeping, reporting and legal compliance, internal investigations).• To protect the rights, property, security, and safety of job applicants, employees, customers, the public and our company assets including facilities and information systems.• To investigate claims or allegations; establish, exercise or defend a legal claim; enforce our rights arising from any contracts entered between you and us including billing and collection.• To assess your application for employment with us or manage the employment relationship.• Provide ADA requested accommodations.• Comply with legal and regulatory obligations (e.g., certain laws and regulations may require us to process your Personal Information. For example, we may collect your age to comply with laws applicable to the collection and disclosure of Personal Information belonging to minors. We may also use your Personal Information to respond to law enforcement requests, as required by applicable law, court order, or governmental regulations, and for other lawful processes or public safety purposes).• 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 is among the assets transferred.
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	<ul style="list-style-type: none">• To fulfill any other purpose for which you provide it.
<p><i>Inferences Draw from Personal Information to create a profile reflecting your preferences, characteristics, and behaviors.</i></p>	<ul style="list-style-type: none">• Communicate with you by phone, email, or text message.• Provide, operate, monitor, analyze, and improve our Site, services, products, programs, events and experiences including managing your account, hosting forums and interactive areas of our Websites and Services.• Provide and deliver products, services, and information; process payments, transactions and returns; send you related information including confirmations, receipts, invoices, customer experience surveys, and recall notices.• Provide technical support (including to debug and troubleshoot), and send you technical notices, updates, security alerts, and support and administrative messages.• Prevent, detect, and investigate fraud and other suspected illegal activities; protect the rights, property, security, and safety of our, our subsidiaries and affiliates, our employees, customers and others.• Engage in advertising, promotional, and marketing activities including creating look alike audiences, remarketing, retargeting, planning or hosting events.• Send communications about our and our subsidiaries', affiliates' and partners' products, services, offers, contests,

promotions, sweepstakes, surveys and customer experience research, news, events, outings, and trips, and other information we think will be of interest to you (for information about how to manage promotional communications, please see "Opt-Out Procedures" below).

- Tailor content and information we send or display to you; offer location customization and personalized recommendations, help, and instructions; and otherwise personalize your experience while using our Site or services including linking or combining with other information we receive from third parties to help understand your preferences and provide you with personalized service.
- Administer and promote contests, promotions, sweepstakes, gift card services, and Incentive Programs.
- Verify or enforce compliance with the terms of use and policies that govern our Site and services.
- Update, maintain, use, and analyze our records.
- Research and development; monitor and analyze trends, usage and activities relating to the Site, in-store activity, purchases, and experiences.
- Administer, develop, and improve our Site, services, stores and experiences.
- For other everyday business purposes (e.g., financial account management, product development, contract management, IT and website administration, corporate governance, record keeping, reporting and legal compliance, internal investigations).
- To protect the rights, property, security, and safety of job applicants, employees, customers, the public and our company

	<p>assets including facilities and information systems.</p> <ul style="list-style-type: none"> • To investigate claims or allegations; establish, exercise or defend a legal claim; enforce our rights arising from any contracts entered between you and us including billing and collection. • To assess your application for employment with us or manage the employment relationship. • Provide ADA requested accommodations. • Comply with legal and regulatory obligations (e.g., certain laws and regulations may require us to process your Personal Information. For example, we may collect your age to comply with laws applicable to the collection and disclosure of Personal Information belonging to minors. We may also use your Personal Information to respond to law enforcement requests, as required by applicable law, court order, or governmental regulations, and for other lawful processes or public safety purposes). • 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 is among the assets transferred. • To fulfill any other purpose for which you provide it.
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II. Your Consumer Rights and How to Exercise Them.

Colorado Consumers have specific rights with respect to Personal Data we collect about them. Subject to verification and certain limitations, these rights include the following:

Disclosing and Selling Personal Data. We do not Sell, as that term is defined by the CPA.

We disclose your Personal Data to the categories of third parties listed in Section 6, above.

Targeted Advertising. We process your Personal Data for Targeted Advertising. To opt out of the processing of your Personal Data for Targeted Advertising, please click [here](#).

Profiling. We do not process Personal Data for Profiling in furtherance of decisions that produce legal or similarly significant effects concerning a Consumer.

Additional Rights:

- a. *Right to Confirmation and Access.* You have the right to request that we confirm whether we are processing your Personal Data and to access such data.
- b. *Right to Request Correction of Your Personal Data.* You have the right to request that we correct any inaccurate Personal Data we maintain about you.
- c. *Right To Request Deletion of Your Personal Data.* You have the right to request that we delete Personal Data we collected or maintain about you.
- d. *Right to Obtain a Copy.* You have the right to obtain a copy of your Personal Data in a portable and, to the extent technically feasible, readily usable format up to two times in per calendar year.

To submit a Colorado Consumer rights request to Access, Correct, Delete or Obtain a Copy, please

- Click [here](#) to be taken to an online request submission form.
- Call 1-800-279-3550

III. Loyalty Rewards Program

From time to time, we may offer coupons, discounts, and other promotions, whether online or in stores, in exchange for you voluntarily providing us with your email address and or cell phone number (“Incentive Programs”). No purchase is necessary to participate. We use the Personal Data you provide in accordance with our Privacy Policy.

All Incentive Programs are provided to you in exchange for the value of your Personal Data to the Company. We use the Personal Data we collect from the Incentive Programs for lead capture, marketing, research, and product development purposes. We do not sell this Personal Data nor do we process it for targeted advertising purposes. To assist us with administering the Incentive Program, we may disclose your Personal Data to service providers and vendors for purposes including but not limited to sending communications, fulfillment, IT and data storage services, marketing vendors, and promotional partners.

C. CONNECTICUT RESIDENTS

The following Connecticut section supplements and amends the Policy to disclose information about our data processing practices and your rights as required by the Connecticut Act Concerning Personal Data

Privacy and Online Monitoring (CTDPA). This CTDPA section applies solely to individuals who are residents of the State of Connecticut (“Consumer” or “you”).

Your Consumer Rights and How to Exercise Them.

Connecticut Consumers have specific rights with respect to Personal Data we collect about them. Subject to verification and certain limitations, these rights include the following:

Disclosing and Selling Your Personal Data. We do not Sell, as that term is defined by the CTDPA, your Personal Data.

We disclose your Personal Data to the categories of third parties listed in Section 6 above.

Targeted Advertising. We process your Personal Data for Targeted Advertising. To opt out of our processing your Personal Data for Targeted Advertising, please click [here](#).

Profiling. We do not process Personal Data for Profiling in furtherance of solely automated decisions that produce legal or similarly significant effects concerning a Consumer.

Additional Rights:

- a. *Right to Confirmation and Access.* You have the right to request that we confirm whether we are processing your Personal Data and to access such data.
- b. *Right to Request Correction of Your Personal Data.* You have the right to request that we correct any inaccurate Personal Data we maintain about you.
- c. *Right To Request Deletion of Your Personal Data.* You have the right to request that we delete Personal Data we collected or maintain about you.
- d. *Right to Obtain a Copy.* You have the right to obtain a copy of your Personal Data in a portable and, to the extent technically feasible, readily usable format where the processing is carried out by automated means.

To submit a request to Access, Correct, Delete or Obtain a Copy, please

- Click [here](#) to be taken to an online request submission form.
- Call 1-800-279-3550

D. NEVADA RESIDENTS

The following Nevada section supplements and amends the Policy to disclose information about our data processing practices and your rights as required by NRS 603A. This section applies solely to individuals who are residents of the State of Nevada (“Consumers” or “you”).

Nevada law requires that we notify Nevada Consumers of their right to submit a verified request instructing us not to Sell any of the Covered Information we have collected or will collect about them through our Site.

To submit your request, you may contact us at consumerprivacy@victra.com.

Please note that we do not Sell Consumer Covered Information. For purposes of this section, Sell means the exchange of Covered Information for monetary consideration by us to a person who will license or sell that information to additional persons. Covered information means a name, physical address, email address, phone number, Social Security number, an identifier that allows you to be contacted physically or online, and any other information collected from you through the Site in combination with an identifier that makes the person's information personally identifiable.

E. OREGON RESIDENTS

Effective July 1, 2024, the following the following Oregon section supplements and amends the Policy to disclose information about our data processing practices and your rights as required by the Oregon Consumer Protection Act ("OCPA"). This OCPA section applies solely to individuals who are residents of the State of Oregon ("Consumer" or "you").

Your Consumer Rights and How to Exercise Them. Oregon Consumers have specific rights with respect to Personal Data we collect about them. Subject to verification and certain limitations, these rights include the following:

Right to Opt Out of the Sale of Your Personal Data. We do not Sell, as that term is defined by the OCPA, your Personal Data.

We disclose your Personal Data to the categories of third parties listed in Section 6, above.

Right to Opt Out of the Processing of Personal Data for Targeted Advertising. We may process your Personal Data for Targeted Advertising. To opt out of our processing your Personal Data for Targeted Advertising, please click [here](#).

Right to Opt Out of the Processing of Personal Data for Profiling. We do not process Personal Data for Profiling in furtherance of decisions that produce legal or similarly significant effects concerning a Consumer.

Right to Revoke Your Consent. You have the right to withdraw your consent where we have obtained your consent to

- a. process your Sensitive Personal Information
- b. process your Personal Data for purposes of Targeted Advertising,
- c. process your Personal Data for purposes of Profiling the Consumer in Furtherance of Decisions that Produce Legal Effects or Effects of Similar Significance
- d. process your Personal Data for purposes of Selling.

To withdraw your consent, please click [here](#).

Additional Rights

- a. *Right to Request Confirmation.* You have the right to request that we confirm whether we are processing your Personal Data and the categories of such Personal Data

- b. *Right to Receive a Copy of Your Personal Data.* You have the right to request a copy in a portable form of your Personal Data that we have processed or are processing.
- c. *Right to Request Correction of Your Personal Data.* You have the right to request that we correct any inaccurate Personal Data we maintain about you.
- d. *Right To Request Deletion of Your Personal Data.* You have the right to request that we delete Personal Data we collected or maintain about you.

To submit an Oregon Consumer rights request to Access, Correct, Delete or Obtain a Copy,

- Click [here](#) to be taken to an online request submission form.
- Call 1-800-279-3550.

Appeals. You may appeal our denial of your request to exercise a Consumer Right by contacting us at consumerprivacy@victra.com within 60 days after you receive our denial.

We will not discriminate against you for exercising any of your rights under the OCPA.

F. UTAH RESIDENTS

The following Utah section supplements and amends the Policy to disclose information about our data processing practices and your rights as required by the Utah Consumer Privacy Act (“UCPA”). This UCPA section applies solely to individuals who are residents of the State of Utah (“Consumer” or “you”).

Your Consumer Rights and How to Exercise Them.

Utah Consumers have specific rights with respect to Personal Data we collect about them. Subject to verification and certain limitations, these rights include the following:

Disclosing and Selling Your Personal Data. We do not Sell, as that term is defined by the UCPA, your Personal Data.

We disclose your Personal Data to the categories of third parties listed in Section 6 above.

Targeted Advertising. We process your Personal Data for Targeted Advertising. To opt out of our processing your Personal Data for Targeted Advertising, please click [here](#).

Additional Rights:

Right to Confirmation and Access. You have the right to request that we confirm whether we are processing your Personal Data and to access such data.

Right To Request Deletion of Your Personal Data. You have the right to request that we delete Personal Data we collected or maintain about you.

Right to Obtain a Copy. You have the right to obtain a copy of your Personal Data that you previously provided to us in a format that to the extent technically feasible, is portable and readily usable format, and allows you to transmit the data to another controller without impediment, where the processing is carried out by automated means.

To submit a request to Access, Delete or Obtain a Copy, please

- Click [here](#) to be taken to an online request submission form.
- Call 1-800-279-3550.

G. VIRGINIA RESIDENTS

The following Virginia section supplements and amends the Policy to disclose information about our data processing practices and your rights as required by the Virginia Consumer Privacy Act (“VCDPA”). This VCDPA section applies solely to individuals who are residents of the State of Virginia (“Consumer” or “you”).

Your Consumer Rights and How to Exercise Them.

Virginia Consumers have specific rights with respect to Personal Data we collect about them. Subject to verification and certain limitations, these rights include the following:

Disclosing and Selling Your Personal Data. We do not Sell, as that term is defined by the VCDPA, your Personal Data.

We disclose your Personal Data to the categories of third parties listed in Section 6, above.

Targeted Advertising. We process your Personal Data for Targeted Advertising. To opt out of our processing your Personal Data for Targeted Advertising, please click [here](#).

Profiling. We do not process Personal Data for Profiling in furtherance of decisions that produce legal or similarly significant effects concerning a Consumer.

Additional Rights:

- Right to Confirmation and Access.* You have the right to request that we confirm whether we are processing your Personal Data and to access such data.
- Right to Request Correction of Your Personal Data.* You have the right to request that we correct any inaccurate Personal Data we maintain about you.
- Right To Request Deletion of Your Personal Data.* You have the right to request that we delete Personal Data we have collected about you.
- Right to Obtain a Copy.* You have the right to obtain a copy of your Personal Data that you previously provided to us in a portable and, to the extent technically feasible, readily usable format where the processing is carried out by automated means.

To submit a request to Access, Correct, Delete or Obtain a Copy, please

- Click [here](#) to be taken to an online request submission form.

- Call 1-800-279-3550.

17. CONTACT US

If you have questions concerning this Privacy Policy, you may contact us at:

Phone: 1-800-279-3550

Email: consumerprivacy@victra.com

Postal Address:

VICTRA

8510 Colonnade Center Drive, Suite 300

Raleigh, North Carolina 27615