PrizePicks™ Privacy Policy

Effective Date: April 15, 2023

At SidePrize LLC (a/k/a Performance Predictions LLC) d/b/a PrizePicks, (collectively with their parents, subsidiaries, affiliates, agents, representatives, consultants, employees, officers, and directors, “PrizePicks,” “we,” “us,” “our,” and/or “Company”), a Georgia limited liability company in good standing, we respect and protect the privacy of visitors to PrizePicks.com (“Site”), and the users that create an Account, download and use the various fantasy sport services offered through the PrizePicks mobile application available on iOS and Android (“App”) (collectively, such services, including any new features and applications, together with the Site, the “Services”). PrizePicks maintains a strict policy to ensure the privacy of individuals who use our Services (“user(s)” or “you”). This policy ("Privacy Policy") describes how PrizePicks processes and collects information, including Personal Information (as defined below) relating to our users. Certain portions of this Privacy Policy also apply to other personal information collected or maintained by PrizePicks, for example, under the California Privacy Rights and Virginia Privacy Rights sections below. Capitalized terms used in this Privacy Policy that are not defined have the same meaning as defined in the PrizePicks Terms of Service (“Terms”).

By clicking accept and using any of the Services of PrizePicks which link to or reference this Privacy Policy, you consent to the terms of this Privacy Policy. If you do not agree to the terms and conditions of this Privacy Policy, including having your Personal Information used in any of the ways described in this Privacy Policy, do not provide us with your information. Please note, however, that if you don’t provide us with your information, you may not be able to use certain parts or features of our Site or we may not be able to provide you certain Services.

1. Changes and Updates to This Privacy Policy

We reserve the right to revise or update this Privacy Policy at any time, and you should periodically read the Privacy Policy to learn of any revisions or updates. If the revision or update is material, we will provide you notification via email or push notification; however, for non-material revisions or updates, we will notify you by posting the revised or updated Privacy Policy and its “Effective Date” on the Site. Using the Site thereafter constitutes your agreement to and acceptance of the Privacy Policy and its revisions or updates.

2. Collection of Personal Information

We collect both personally identifiable information and non-personally identifiable information about you to help you use the Site. “Personal Information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, as defined by applicable privacy laws.

We collect Personal Information about you in various ways, including:

- directly from you
- automatically when you use the Services
- from third parties

Information We Collect Directly from You
You may provide Personal Information to us directly in numerous ways. For example, when you:

- signup to use the Services
- request certain materials
- communicate with us via email, phone, chat, or otherwise

We collect the following types of Personal Information from you directly:

- **Identifiers**, including real name, date of birth, gender, postal address, unique identifier (username and password), email address, telephone number, driver’s license number, social security number, contents of dialog boxes or chats, responses to feedback requests and surveys
- **Information Listed in the California Customer Records Statute**, including real name, postal address, telephone number, driver’s license number, social security number, credit and debit card numbers, other financial information
- **Legally Protected Characteristics Under California or Federal Law**, including age and gender
- **Sensitive Personal Information**, including driver’s license number, social security number, contents of mail, email, or texts, account log-in username and password

**Special Categories of Information**

Some of the data that we may collect is particularly sensitive (e.g., driver’s license number, social security number, contents of mail, email, or texts, and account log-in username and password). We only collect this information as provided by or consented by you.

We only share this sensitive data for the purpose of providing the services you request or as consented for and will not be shared or used by us for any other purposes.

**Information We Collect About You**

PrizePicks and third-party service providers may automatically collect data about you when you use the Services. This information is primarily needed to maintain the security and operation of the Services, and for our internal analytics so that we can improve the Services. This information includes:

- **Commercial Information**, including products or services purchased, obtained, considered, and other tendencies
- **Internet or Other Electronic Network Activity Information**, including browsing history, browser and device information, operating system, browser type, browsing actions and pattern, clickstreams, search history, contest history, information regarding your interaction with our Site, IP address, cookies, web beacons, pixel tags
- **Geolocation**, including IP address and GPS coordinates

**Information We Receive from Third Parties**

In some instances, PrizePicks may receive Personal Information and/or anonymous data about you from other parties, such as our affiliates, business partners, and service providers. That information may be obtained online, offline, or through publicly available resources. We may combine this data with the information you provide, and other data we already have about you.

We may also receive information about you from social media platforms, such as when you interact with us on those platforms or access our social media content. Please note that the information we may receive from those third-party sites (such as Facebook, Instagram, Twitter, and YouTube) is governed by the privacy settings, policies
and/or procedures of the applicable platform, and we strongly encourage you to review them before submitting any information using a social media platform.

3. Processing and Methods of Collection

We may use aggregated (anonymized) information about our users, and information that does not identify any individual, without restriction. We collect and use information for business and commercial purposes in accordance with the practices described in this Privacy Policy. Our business purposes for collecting and using information include:

- To collect or disburse payment for transactions made through the Services;
- To generally enable you to use our Services;
- To provide you with information, products, or services that you request from us;
- To customize and personalize the content we deliver to you both on the Services;
- To provide customer service and support;
- To send you administrative messages about the Services;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- To notify you about changes to our Services or any products or services we offer or provide through it.
- To monitor and analyze trends, usage, and activities in connection with the Services;
- To investigate and prevent fraudulent transactions, unauthorized access to the Services, violations of the Terms, and other illegal activities;
- To share testimonials or reviews that you may have posted to the Services or other PrizePicks owned social media pages;
- In any other way we may describe when you provide the information;
- For any other purpose with your consent; and
- As otherwise set forth in this Privacy Policy.

Cookies & Similar Technologies

Cookies. Cookies are small pieces of data stored locally in the temporary memory of your web browser and/or the hard drive of your device. We use cookies to help us manage and report on your interaction with the Site or App. Through cookies, we are able to distinguish you from other Users, collect information that we use to improve the Services, keep count of return visits to our website or our advertisers' or partners' websites, collect and report on aggregate statistical information, authenticate your login credentials, or manage multiple instances of the Site in a single browser. We may also collect other data such as the page or site that referred you to the Site, the date and time you visited the Site, and your current IP address. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of the Site or the functions of the Services may be impaired, therefore we disclaim, and you hereby waive, any claim or liability that may arise due to your partial or incomplete access to the content of any of our Services as a result thereof. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Site.

The Help portion of the toolbar on most 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, or how to disable cookies altogether. For more information on cookies and how to disable them, you can consult the information provided by the Interactive Advertising Bureau at [www.allaboutcookies.org](http://www.allaboutcookies.org). From your mobile device, you can understand which third parties have currently enabled cookies and how to opt-out by accessing the Network Advertising Initiative's website at [http://www.networkadvertising.org/mobile-choices](http://www.networkadvertising.org/mobile-choices). On iOS devices you may also select “Opt out of Interest-Based Ads” in your settings.

Log Files and Web Beacons. Pages of the Site and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity). Occasionally, we connect personal information to information gathered in our log files as necessary to improve our Site and Services. In such a case, we would treat the combined information in accordance with this Privacy Policy. Log files that we collect include IP addresses, browser type, domain names, access times, and physical location.

Heat mapping and session recording. Heat mapping services are used to display the areas of a page where Users most frequently move the mouse or click. These services make it possible to monitor and analyze web traffic and
keep track of User behavior. Some of these services may record sessions and make them available for later visual playback.

**Real-Time Location.** Our Services collect real-time information about the location of your device. Disabling location data will impair the functions of Services, including prohibiting you from entering into Contests.

**Google Analytics**

We use Google Analytics on our Services to help us analyze the traffic on our Services. For more information on Google Analytics’ processing of Personal Information, please see http://www.google.com/policies/privacy/partners. You may opt out of the use of Google Analytics here: https://tools.google.com/dlpage/gaoptout. We may also use your information to contact you about our own and third-parties’ goods and services that may be of interest to you. If you do not want us to use your information in this way, please adjust your user preferences in your account profile or by following the unsubscribe instructions included in our marketing communications. For more information, see Choices About Your Personal Information.

4. Disclosure of Personal Information

We may share some information we collect about our Users, including Personal Information, with our service providers, and partners who assist us in operating the Site and providing our Products, and in some cases, legal authorities.

- **Service Providers and Vendors.** We use third party providers and vendors to help us operate and improve the Services on our behalf, such as web-hosting companies, information technology providers, web-development consultants, analytics providers, delivery of goods and services, processing of credit card payments, billing and debt collection, customer services, marketing and communications services and event hosting; and

  - **PayPal.** We use PayPal as a payment processor. For more information on PayPal’s privacy practices, please visit https://www.paypal.com/us/webapps/mpp/ua/privacy-full.
  
  - **WorldPay.** We use WorldPay as a payment processor. For more information on WorldPay’s privacy practices, please visit worldpay-privacy-notice-english.pdf (fisglobal.com).
  
  - **Nuvei.** We use Nuvei as a payment processor. For more information on Nuvei’s privacy practices, please visit Privacy Notice — Nuvei.
  
  - **Aeropay.** We use Aeropay as a payment vendor. PrizePicks has partnered with financial services software company Aeropay to offer you ACH payments. When you create a PrizePicks Account and connect a bank to complete ACH payments, you will be creating an Aeropay account. It is your responsibility to make sure the data you provide is accurate and complete. You must comply also with Aeropay’s privacy policy (the “Aeropay Privacy Policy” Aeropay Privacy Policy) when creating or using your PrizePicks Account. The Aeropay Privacy Policy may be modified from time to time, and the governing version is incorporated by reference into this Privacy Policy.

- **Other Situations.** We may use and disclose information outside of our day-to-day business practices and in ways unrelated to the Services.

  - **In the Event of Merger, Sale, Divestitures or Change of Control.** We may transfer or assign Personal Information to an entity that acquires or is merged with us as part of a merger, acquisition, sale of ownership or assets, or other change of control.
  
  - **Affiliates.** We may disclose Personal Information about you to our affiliates.
  
  - **Other Disclosures.** We may disclose Personal Information about you if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our Terms of
Service, including investigations of potential violations thereof; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to our, your, or third parties’ rights, property, or safety.

- **Authorized Representatives.** If another individual is managing your account on your behalf (for example, a wife managing the account of her husband), as authorized by you or as a personal representative under applicable law, that person can view all Personal Information about you.

- **With Your Consent.** We may share your information for other purposes pursuant to your consent or at your direction.

We do not sell, rent or otherwise share any information with unaffiliated entities except as described in this Privacy Policy, or with your prior permission. We may share or use anonymized information in any manner we choose. Anonymized information, which is de-identified or non-personal information, is information assembled into groupings that can no longer be reasonably used to identify you or your organization.

Other than as set out above, you will receive notice when information about you might go to third parties, and you will have an opportunity to choose not to share the information.

5. **Third Party Links**

The Services may link to third-party websites, online services, mobile applications and/or contain advertisements from third parties that are not affiliated with us—and which may link to other websites, services, or applications. Please be aware that we are not responsible for the privacy or practices of other websites or third parties, including those using the PrizePicks branding. We do not make any guarantee regarding those third-party websites, services, or applications, and we are not liable for any loss or damage caused by the use of such sites. Any data collected by third parties is not covered by this Privacy Policy. You should review the policies of the third parties and contact them directly if you have any questions about their services or practices.

6. **Public Activities**

PrizePicks may offer publicly available spaces on the Services where you and other users may communicate, interact, and engage with each other as well as add information about yourself and your content ("Public Activities"). If you choose to engage in Public Activities on the Services, please be aware that any information you share may be read, collected, or used by other users, third parties, and the public, including those that do not adhere to our Privacy Policy. The protections described in this Privacy Policy do not apply when you provide information, including any Personal Information, in connection with Public Activities. You should use caution in disclosing Personal Information on your profile or on any other publicly available space on the Services. Depending on the permissions you grant, a third party may be able to obtain your account information and other information you choose to provide. We are not responsible for events arising from the distribution of any information you choose to publicly post or share throughout the Services.

7. **Confidentiality and Security**

PrizePicks values your privacy and is committed to protecting your information. As such, we have implemented appropriate administrative, technical, and physical safeguards designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, or disclosure. We undertake commercially reasonable efforts to guard against unauthorized access, use, alteration, or destruction of Personal Information, which efforts you agree are sufficient, adequate, and complete. When contracting with supplies and/or service providers, PrizePicks takes appropriate steps to ensure that such third parties are required to maintain adequate protection of Personal Information.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in Public Activities of the Services like company profile pages or message boards. The information you share in Public Activities may be viewed by any user of the Services and, depending on where the information is posted, by some users of the Services.
Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your Personal Information transmitted to the Services. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

8. Information Retention

We keep your Personal Information only as long as necessary to provide you with our Services and for legitimate and essential business purposes, such as maintaining the performance of the Services, making data-driven business decisions about new features and offerings, complying with our legal obligations (which may include following retention schedules), and resolving disputes.

9. International Transfer of Personal Information

The Services are only available within the United States and Canada. PrizePicks stores personal information about users within the United States. If you are using the Services from outside the United States, please note that you are agreeing to the transfer of your Personal Information to the United States. The United States may have laws which are different, and potentially not as protective, as the laws of your own country. By providing your Personal Information, you consent to any transfer and processing in accordance with this Privacy Policy.

10. Choices About Your Personal Information

You have choices about how we use your information. Please understand that if you choose not to disclose information to us, it may affect your ability to use some features of the Services.

Account Profile

You can review and change your Personal Information by visiting your account profile page. You may also send us an email to request access to, correct or delete any personal information that you have provided to us. If you request us to delete your Personal Information, that will be accomplished by deactivation of your account; however, we may not be able to accommodate a request to change or fully delete information if we believe the change or deletion would violate any law or legal requirement or cause the information to be incorrect. If we are unable to delete your information due to legal requirements, including “Know Your Customer” requirements and responsible gaming regulations, the portion of your information that we do not delete will be retained in deactivated status for purposes of compliance with our legal obligations.

Please note, if you delete user contributions in Public Activities from the Services, copies of your user contributions may remain viewable in cached and archived pages or might have been copied or stored by other users.

Marketing

If you have provided your email address to us, we may send you emails or notifications to provide you with information, to inform you of new events or content, to solicit your feedback, or to keep you up to date on us. You can opt out of our marketing communications at any time by clicking the link in the footer of all non-transactional emails or otherwise following the opt-out prompts on these communications. You also may ask us not to send you other marketing communications by contacting us as specified in the Contact Us section below, and we will honor your request. Please note that even after you are removed from our marketing lists, we may still send you non-promotional communications, such as responding to service requests. Moreover, some communications, however, are considered transactional and are necessary for all Users (e.g. important account notifications and billing information). You must cancel your PrizePicks account to unsubscribe from transactional communications.

Advertisements

Advertisements appearing on the Services may be delivered by advertising partners, who may use cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement to compile information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies by us and does not cover the use of cookies by any advertisers.

We and our service providers may use information about your interactions with the Site to predict your interests and select the ads you see on and off the Site. This is known as interest-based advertising. In providing interest-based ads, we follow the Self-Regulatory Principles for Online Behavioral Advertising developed by the Digital
Advertising Alliance ("DAA"). For more information about interest-based advertising and how you can opt out, visit:

- Digital Advertising Alliance: http://www.aboutads.info/choices
- Network Advertising Initiative: http://www.networkadvertising.org/choices/

**Do-Not-Track Disclosure**

Many web browsers include a Do Not Track ("DNT") feature or setting that signals your preference not to have data about your online browsing activities monitored and collected. However, there is currently no uniform standard for recognizing and implementing DNT signals. As such, PrizePicks does not monitor or respond to DNT browser requests.

**11. Children**

Our Services are not intended for children. No one under the age of 19 may provide any personal information to or on the Services. We do not knowingly collect personal information from individuals under 19. If you are under 19, do not use the Services, make any purchases, use any of the interactive or public comment features, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received personal information from a child, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us as set forth in the **Contact Us** section below.

**12. California Privacy Rights**

This section is applicable to residents of California. If you are a resident of California, you have certain rights described below. The following do not apply to individuals who do not live in California on a permanent basis, individuals we do not collect personal information about, or individuals for whom all of the information we collect is exempt from the statutes.

**Shine the Light Law**

Under California’s “Shine the Light” law (California Civil Code §1798.83), California residents have the right to request in writing from businesses with whom they have an established business relationship, (a) a list of the categories of Personal Information, such as name, e-mail and mailing address and the type of services provided to the customer, that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties’ direct marketing purposes; and (b) the names and addresses of all such third parties. To request the above information, please contact us as set forth in the **Contact Us** section below with a reference to California Disclosure Information. Please note that we are only required to respond to two requests per California resident each year under §1798.83.

**California Privacy Rights for Minor Users**

Under California’s Business and Professions Code §22581, California residents under the age of 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted. To request removal of such information, and if you are a California resident under the age of 18, please contact us as set forth in the **Contact Us** section below with a reference to California Privacy Rights for Minor Users.

**California Consumer Privacy Act of 2018**

This section of our Privacy Policy provides California residents with a comprehensive description of PrizePicks’ online and offline practices regarding the collection, use, disclosure, and sale of personal information and the rights of California consumers regarding their personal information that is subject to the California Consumer Privacy Act of 2018 (CCPA) or any amendments or acts thereto upon their effective dates. The section will not apply, however, if PrizePicks does not collect any personal information about you or if all of the information we collect is exempt from the statute (for example, the CCPA does not protect information that is already protected by certain other privacy laws, and it does not protect information that is already publicly available). **“Personal Information,”** for purposes of this section regarding the rights of California consumers, means, identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular
consumer or household and does not include de-identified or aggregate information or publicly available information.

Rights under CCPA

Under CCPA, consumers have certain rights regarding their Personal Information, as described below.

- **Right of Access:** You have the right to request, twice in a 12-month period, that we disclose to you the following information about you, limited to the preceding twelve (12) months:
  - The categories of Personal Information that we collected about you;
  - The categories of sources from which the Personal Information is collected;
  - The business or commercial purpose for collecting or selling Personal Information;
  - The categories of third parties with whom we share Personal Information;
  - The specific pieces of Personal Information that we have collected about you;
  - The categories of Personal Information that we disclosed about you for a business purpose or sold to third-parties; and
  - For each category of Personal Information identified, the categories of third parties to whom the information was disclosed or sold.

- **Right of Deletion:** You have the right to request that we delete any Personal Information about you which we have collected from you, subject to exceptions within the law.

- **Right to Opt-Out:** You have the right to opt-out of the disclosure of Personal Information about you for monetary or other valuable consideration. However, we do not sell or share any Personal Information for monetary payments. However, like many companies we do use services that help deliver interest-based ads to you and we may transfer Personal Information to business partners for their use. Because the definitions of ‘Personal Information,’ ‘share,’ and ‘sale’ under the California law are broad, making Personal Information available to these companies may be considered a “sale” or “sharing” under CCPA. You can opt out of such “sale” or “sharing” here: Do Not Sell or Share My Information. You may also contact us by using the Contact Us section below with a reference to “CCPA.”

- **Right to Opt-In:** We do not knowingly collect, share, or sell Personal Information of individuals under the age of 18.

- **Right to Limit Use and Disclosure of Sensitive Personal Information:** You may request specific limitations on further sharing, use, or disclosure of your Sensitive Personal Information that is collected or processed for purposes outside of those permissible under the CCPA.

- **Right to Correction:** You have the right to request that we maintain accurate Personal Information about you and correct any Personal Information about you which we have collected from you, subject to exceptions within the law.

If you would like to exercise your rights, please refer to the Consumer Requests and Verification section below with a reference to “CCPA.”

- **Right to Non-Discrimination:** We may not discriminate against you because you exercise any of your rights under the CCPA, including, but not limited to:
  - Denying goods or services to you;
  - Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
  - Providing a different level or quality of goods or services to you; or
Selling, Sharing, and Disclosing Personal Information

We do not sell or share your Personal Information in exchange for monetary consideration. However, the definitions of Personal Information, ‘share,’ and ‘sale’ under CCPA are broad. Like many companies, we use services that help deliver interest-based ads and personalization to you, which may involve transfer Personal Information to business partners for their use, such as Google Analytics. Because the definitions of ‘Personal Information,’ ‘share,’ and ‘sale’ under CCPA are broad, making Personal Information available to these companies may be considered a “sale” or “sharing” under CCPA. Because of the breadth of these definitions under CCPA, we have provided opt-out links. You have the right to direct us not to sell or share your Personal Information. You may exercise your opt-out rights by contacting us using a method listed in the Contact Us section.

During the 12-month period prior to the “Last Modified” date of this Privacy Policy, we may have shared or disclosed the following categories of Personal Information about you for a business or commercial purpose with certain categories of third parties, as described below:

<table>
<thead>
<tr>
<th>Categories of Personal Information that May Be Sold, Shared, or Disclosed</th>
<th>Sources of Collected Information</th>
<th>Categories of Third Parties to whom Personal Information May Be Sold, Shared, or Disclosed</th>
<th>Business or Commercial Purpose of Selling, Sharing, or Disclosing Personal Information</th>
</tr>
</thead>
</table>
| Identifiers | Directly from you; Automatically when you use the Services; From Third Parties | Service Providers Vendors | • Enable you to use the Services  
• Provide customer support  
• Provide you with information and services  
• Process or fulfill your transactions  
• Rectify any complaints about a service or feature  
• Notify of any changes  
• Support our internal and business operations  
• Investigate and prevent fraudulent transactions and violations of the Terms and other illegal activities |
<table>
<thead>
<tr>
<th>Category</th>
<th>Source of Data</th>
<th>Categories</th>
<th>Uses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Additional Information Subject to Cal. Civ. Code § 1798.80</td>
<td>Directly from you; From Third Parties</td>
<td>Service Providers, Vendors</td>
<td>Enable you to use the Services, Provide customer support, Process or fulfill your transactions, Rectify any complaints about a service or feature, Support our internal and business operations, Fulfill your request</td>
</tr>
<tr>
<td>Legally Protected Characteristics under California or Federal Law</td>
<td>Directly from you; From Third Parties</td>
<td>Service Providers, Vendors</td>
<td>Support our internal and business operations</td>
</tr>
<tr>
<td>Commercial Purchase Information</td>
<td>Automatically when you use the Services</td>
<td>Service Providers, Vendors, Advertising Partners</td>
<td>Market our products and services to you, Monitor and analyze trends, usage, and activities in connection with the Services</td>
</tr>
<tr>
<td>Internet or Other Electronic Information Activity</td>
<td>Automatically when you use the Services</td>
<td>Service Providers, Advertising Partners</td>
<td>Maintain and operate our Services, Support our internal and business operations, Market our products and services to you, Research and understand how you use our products and services, Investigate and prevent fraudulent transactions and violations of the Terms and other illegal activities</td>
</tr>
<tr>
<td>Geolocation</td>
<td>Automatically when you use the Services</td>
<td>Service Providers, Dealers</td>
<td>Maintain and operate our Services and Site, Support our internal and business operations</td>
</tr>
<tr>
<td>Sensitive Personal Information</td>
<td>Directly from you; From Third Parties; Automatically when you use the Site</td>
<td>• Service Providers • Dealers</td>
<td>• Enable you to use the Services • Provide customer support • Provide you with information and services • Process or fulfill your transactions • Rectify any complaints about a service or feature • Notify of any changes • Support our internal and business operations • Investigate and prevent fraudulent transactions and violations of the Terms and other illegal activities</td>
</tr>
</tbody>
</table>

- The categories of parties with whom we disclose Personal Information are described in detail in the Disclosure of Personal Information section of this Privacy Policy.

- The retention periods for Personal Information collected by us are described in detail in the Information Retention section of this Privacy Policy.

- The purpose for collection of the categories is described in detail in the Processing Purposes section of this Privacy Policy.

13. Virginia Privacy Rights

This section is applicable to residents of Virginia. If you are a resident of Virginia, you have certain rights described below. The following do not apply to individuals who do not live in Virginia on a permanent basis, individuals we do not collect personal information about, or individuals for whom all of the information we collect is exempt from the statutes. "Personal Data," for purposes of this section regarding the rights of Virginia residents, means any information that is linked or reasonably linkable to an identified or identifiable natural person and does not include de-identified information or publicly available information.

The Virginia Consumer Data Protection Act

This section applies only to Virginia residents to the extent their Personal Data is subject to the Virginia Consumer Data Protection Act (VCDPA), or any amendments or acts thereto upon their effective dates. The categories of Personal Data processed, the purposes of processing, the categories of Personal Data shared, and the categories of third parties to which Personal Data is shared are provided in the above sections of this Policy, including the chart depicted in the above section California Consumer Privacy Act.

Rights under VCDPA

VCDPA provides residents with specific rights regarding Personal Data, including:

- **Right to Access.** You have the right to confirm whether or not we are processing your Personal Data and to access such information.
• **Right to Correction.** You have the right to correct inaccuracies in your Personal Data which we have collected, taking into account the nature of the Personal Data and the purposes of processing the Personal Data.

• **Right to Deletion.** You have the right to request deletion of Personal Data provided by or obtained about you, subject to legal exemptions.

• **Right to Data Portability.** You have the right to obtain a copy of your Personal Data.

• **Right to Opt-Out.** You have the right to opt out of the processing of Personal Data for purposes of (1) targeted advertising; (2) the sale of Personal Data; or (3) profiling in furtherance of decisions that produce legal or similarly significant effects.

• **Right to Non-Discrimination.** You have the right not to receive discriminatory treatment by us for exercising any of your privacy rights. We will not discriminate against any Virginia consumer for exercising any of the consumer’s rights under VCDPA, including, but not limited to: (1) denying goods or Services; (2) charging different prices or rates for goods and Services; and (3) providing a different level or quality of goods or Services. We may, however, charge a different price or rate, or provide a different level or quality of goods or Services, if that difference is related to the value provided to you by your data and/or the consumer’s voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

If you would like to exercise any of the rights provided under VCDPA, please refer to the Consumer Requests and Verification section below with a reference to “VCDPA.”

**14. Consumer Requests and Verification**

You may request to exercise your rights of access, deletion, correction, or complaints under CCPA or VCDPA by contacting us as described in the Contact Us section below. To help protect your privacy and maintain security, we will take steps to verify your identity before processing your request. If you request access to or deletion of your Personal Information, we may require you to provide any of the following information: name, date of birth, email address, telephone number, or postal address. When you make such a request, you can expect the following:

• As required under applicable law, we will verify your identity. You will need to provide us with your email address and full name. We may ask for additional information if needed.

• We will confirm that you want your information accessed, corrected, and/or deleted.

• We will confirm our receipt of your request within ten (10) days. If you have not received a response within a few days after that, please let us know by contacting us at the webpage or phone number listed below.

• We will respond to your request within thirty (30) days upon receipt of your request. If necessary, we may need an additional period of time, up to another forty-five (45) days, but we will reply either way within the first 30-day period and, if we need an extension, we will explain why.

• In certain cases, a request for access, correction, or deletion may be denied. For example, if we cannot verify your identity, the law requires that we maintain the information, or if we need the information for internal purposes such as providing Services or completing an order. If we deny your request, we will explain why we denied it and delete any other information that is not protected and subject to denial.

*Virginia Appeal Process*

If you have made a request to access, correct, or delete your Personal Data under VCDPA, and we have declined to take action, you may appeal our decision within forty-five (45) days of the denial. When you make such an appeal, you can expect the following:

• We will verify your identity. You will need to provide us with your email address and full name. We may ask for additional information if needed.
● We will review your appeal and respond in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decision, within forty-five (45) days upon receipt of your appeal. If necessary, we may need an additional period of time, up to another forty-five (45) days, but we will reply either way within the first 45-day period and, if we need an extension, we will explain why.

● In certain cases, an appeal may be denied. For example, if we cannot verify your identity, the law requires that we maintain the information, or if we need the information for internal purposes such as providing Services or completing an order. If we deny your appeal, we will explain why we denied it and provide you with a method to contact your state’s Attorney General to submit a complaint.

15. Contact Us
If you believe that you have been harmed by an act of ours in violation of law, we encourage you to contact us directly in order to resolve your concern. To contact us, including if you have questions about this Privacy Policy, please contact support@prizepicks.com or use our customer support chat tool located on the Services.