

Privacy Policy

Last Updated: December 31, 2019

I. Introduction and Overview

Thank you for using our services. This Privacy Policy explains what information we collect, how that information is used, under what circumstances we share information, and the choices you can make about that information. This Privacy Policy applies whether you access our services through a browser, a mobile application, or any other manner.

This Privacy Policy also describes how we collect, use and disclose your personally identifiable information (“PII”), PII is information about you that may be used to identify you (such as your name, phone number, or address).

II. Information We Collect

1. Information you provide to us or allow others to provide to us

At various points you may provide us with information about yourself. For example, when you create an account, you provide us with personal information like your name, email address, and zip or postal code. And for various loyalty rewards programs, we may collect information including your address, phone number, or birth date. Your account information may be updated or corrected by accessing your account settings.

If you log into your account through a third-party service, both we and that third-party may receive some information about you and your use of our services. For example, if you choose to log in with your Facebook account, we may receive information from Facebook, such as your name, e-mail address, public profile information, and information about your contacts. We may also offer social sharing tools (such as the Facebook “Like” button) that let you share actions with other websites and vice versa. In those cases, the providers of those tools may receive information about you when you use those tools. You should check the privacy policies of these third-party services and your settings there for more information.

If you wish to invite your friends and contacts to use our services, we will give you the option of either entering in their contact information manually or, for United States residents, importing it from your address books on other third-party services. In both cases, we will store this information for the sole purposes of allowing you to send your friends referral offers, for determining whether your friends use our services after a referral is sent, and, for United States residents, to remind your friends of the referral sent on your behalf.

Our partners may let us collect information about use of their sites/apps or share such information with us. For example, if you use our button or widget on another site or app, we may receive information about your use of that button or widget and the third-party site/app.

2. Technical information about usage of our services

When you use our services, either through a browser or mobile app, we automatically receive some technical information about the hardware and software that is being used.

Cookies, Pixels, and Other Tracking Technologies:

We, our partners, our advertisers, and third-party advertising networks use various technologies to collect information, including but not limited to cookies, pixels, scripts, and device identifiers. Cookies are small text files that are sent by your computer when you access our services through a browser. We, our partners, our advertisers, and third-party advertising networks may use session cookies (which expire when you close your browser), persistent cookies (which only expire when you choose to clear them from your browser), pixels, scripts, and other identifiers to collect information from your browser or device that helps us do things such as understand how you use our services and other services; personalize your experience; measure, manage, and display advertising on our services or on other services; understand your usage of our services and other services in order to serve customized ads; and remember that you are logged into our services. Our partners, advertisers, and third-party advertising networks may use these technologies to collect information about your online activity over time and across different websites or online services. By using your browser settings, you may block cookies or adjust settings for notifications when a cookie is set. Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do regarding these signals. Accordingly, unless and until the law is interpreted to require us to do so, we do not monitor or act with respect to “Do Not Track” signals. For more information on “Do Not Track,” visit <http://www.allaboutdnt.com>.

We employ some third-party services to help us understand the usage of our services and the performance of advertising, and these third parties may also deploy cookies, pixels, or other identifiers on our services or collect information through our mobile applications. For example, we use Google Analytics to understand, in a non-personally identifying way, how users interact with various portions of our services -- you can [learn more about information that Google may collect here](#).

Log information:

When you use our services, our servers will record information about your usage of our services and information that is sent by your browser or device. Log information can include things like the IP address of your device, information about the browser, operating system and/or app you are using, unique device identifiers, pages that you navigate to and links that you click, searches that you run on our services, and other ways you interact with our services. If you are logged into our services, this information is stored with your account information.

Interest-Based or Online Behavioral Advertising:

We may use third-party advertising companies to serve interest-based advertisements to you. These companies compile information from various online sources (including mobile-enabled

browsers and applications) to match you with ads that will be the most relevant, interesting, and timely for you. If you would like to opt-out of interest-based advertising, please visit <http://optout.networkadvertising.org/#/> . Please note that you will be opted out of all interest-based advertising from all business members of the Network Advertising Initiative for that specific browser on that specific device. If you opt-out, you may continue to see We, or our partners' online advertisements; however, these ads will not be as relevant to you.

3. Children

Our services are not intended for children under 13 years of age, and we do not knowingly collect personal information (as defined by the U.S. Children's Online Privacy Protection Act, or "COPPA") in a manner not permitted by COPPA. If we obtain actual knowledge that any information, we collect has been provided by a child under the age of 13, we will delete that information to the extent required by applicable laws.

We do not knowingly "sell," as that term is defined under the California Consumer Protect Act ("CCPA"), the personal information of minors under 16 years old who are California residents.

III. How We Use Your Information

We may use the information we collect for various purposes, including to:

- Provide our services to you, improve the quality of the service, and develop new products and services
- Charge you for the purchase and delivery costs through one or more payment processing partners
- Offer you customized content (including advertising, coupons, and promotions)
- Understand how users interact with our services (including advertising both on and off our services) as a whole and to test new features or changes in our features
- Provide customer service, respond to your communications and requests, and contact you about your use of our services
- Fulfill any other business or commercial purposes at your direction or with prior notice to you and your consent

You can opt-out of receiving promotional communications from us by using the settings on the Account Info page or by using the unsubscribe mechanism included in the message, where applicable.

IV. What We Share

We share information under the following principles:

- *With your consent or at your direction* — We will share your information with entities outside of our services when we have your consent to do so or it is done at your direction. For example:

- If you enter loyalty card information from a retailer, we share that information with the retailer you chose along with your order so that information can be added to your loyalty card account.
 - If you invite friends to use our services through our referral program, we will share some information with the friends you invite like your name.
- *With our retail partners* — We may share your information with our retail partners in order to provide and maintain our services.
- *For legal purposes* — We may share your information when we believe that the disclosure is reasonably necessary to (a) comply with applicable laws, regulations, legal process, or requests from law enforcement or regulatory authorities, (b) prevent, detect, or otherwise handle fraud, security, or technical issues, and (c) protect the safety, rights, or property of any person, the public.
- *On a non-personal or aggregate basis* — We share information on both a non-personally identifying basis (including, but not limited to, order and delivery details but not including credit card information) or an aggregate basis.
- *For business purposes* — We may share your information in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company. We may also share your information between and among We, and its current and future parents, affiliates, subsidiaries, and other companies under common control and ownership.

V. Security

We employ and maintain reasonable administrative, physical, and technical measures designed to safeguard and protect information under our control from unauthorized access, use, and disclosure. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you.

We will make any legally required notifications of any breach of the security, confidentiality, or integrity of your PII, including, without limitation, breaches of your stored PII (as breaches are defined under applicable state or federal statutes on security breach notification). To the extent permitted by applicable laws, we will make such notifications to you without unreasonable delay, as consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

VI. Changes to this Policy

This policy may change from time to time and any revised Privacy Policy will be posted at this page, so we encourage you to review it regularly. If we make changes, we will notify you by revising the date at the top of this Privacy Policy and, in the case of materials changes to the Privacy Policy, we may provide you with additional notice (such as a notice in our user interface or sending you a notification by email).

VII. Additional Disclosures

The California Consumer Privacy Act of 2018 (“**CCPA**”) provides additional rights to know, delete and opt out, and requires businesses collecting or disclosing personal information to provide notices and means to exercise those rights, but **we will provide the same rights and protections to all of our customers**. The words used in this section have the meanings given to them in the CCPA, which may be broader than their common meaning. For example, the definition of “personal information” under the CCPA includes your name, but also more general information like age.

A. Notice of Collection.

Although the information we collect is described in greater detail in Section II above, the categories of personal information that we have collected – as described by the CCPA – including in the past 12 months are:

- **Identifiers** - including name, email address, and IP address.
- **Other individual customer records** - including phone number, billing and shipping address, and credit or debit card information. This category includes personal information protected under pre-existing California law (Cal. Civ. Code 1798.80(e)), and overlaps with other categories listed here
- **Demographics** - including your age. This category includes data that may qualify as protected classifications under other California or federal laws.
- **Commercial information** - including purchases and engagement with our services.
- **Internet activity** - including your interactions with our service.
- **Geolocation data** - including location enabled services such as Wi-Fi and GPS.
- **Sensory Information** - such as recordings of phone calls between you and us and surveillance video at our properties, where permitted by law.
- **Inferences** - including information about your interests, preferences and favorites.
- **Health Information** - including any information you provide to us regarding an experience with a retailer that may require us to contact that retailer or other retailer partners for public health or safety reasons, or to facilitate a refund. We do not share your identity with retailers we may contact in such a capacity, but do share date, time and location of a transaction, which may allow a retailer to independently identify you.

For more information on our collection practices, including the sources we receive information from, please review “Information We Collect” (Section II above). We collect and use these categories of personal information for the business purposes described in “How We Use Your Information” (Section III above), including to provide and manage our Services.

We disclose the following categories of personal information to third parties for our commercial purposes: identifiers, demographic information, commercial information, relevant order information, internet activity, geolocation data, sensory information, and inferences. We partner with different types of entities to assist with our daily operations and manage our Services. Please review “What We Share” (Section IV above) for more

detail about the third parties we have shared information with and the underlying principles the guide our sharing practices.

B. Right to Know and Delete.

Our customers have the right to delete the personal information we have collected from you, and the right to know certain information about our data practices in the preceding twelve (12) months. You have the right to request the following from us:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information was collected;
- The categories of personal information about you we disclosed for a business purpose or sold;
- The categories of third parties to whom the personal information was disclosed for a business purpose or sold;
- The business or commercial purpose for collecting or selling the personal information; and
- The specific pieces of personal information we have collected about you

If you would like to download or delete your personal information, you can do so by visiting www.electrumcorporation.com/public/privacy.asp, or email us at support@electrumcorporation.com. In the request, please specify which right you are seeking to exercise and the scope of the request. We will confirm receipt of your request within 10 days. We may require specific information from you to help us verify your identity and process your request. If we are unable to verify your identity, we may deny your requests to know or delete.

C. Right to Opt-Out.

We do not generally sell information as the term “sell” is traditionally understood. However, if and to the extent “sale” under the CCPA is interpreted to include advertising technology activities such as those implemented specifically for interest-based advertising, we will comply with applicable law as to such activity.

D. Authorized Agent.

You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent’s permission to do so and verify your identity directly.

E. Right to Non-Discrimination.

You have the right not to receive discriminatory treatment by us for the exercise of any your rights.

F. Shine the Light.

You may ask us a notice describing what categories of personal information We share with third parties or affiliates for those third parties or affiliates' direct marketing purposes and identify the name and address of the third parties that received such personal information. Please submit a written request to the address provided below and specify you want a copy of your Shine the Light Notice. We may require additional information from you to allow us to verify your identity and are only required to respond to requests once during any calendar year.

G. Consumer Affairs

If you have a question or complaint regarding the Website, please send an email to support@electrumcorporation.com. You may also contact us by writing to us at the address provided below under the Section entitled "Contact Information". California residents may reach the Complaint Assistance Unit of the Division of Consumer Services of the California Department of Consumer Affairs may be contacted in writing at 400 R Street, Suite 1080, Sacramento, California 95814, or by telephone at (916) 445-1254 or (800) 952-5210.

VIII. Contact Information

Questions or comments about our Privacy Policy? Contact our Privacy Team at:

Electrum Holdings, LLC
P.O. Box 1206
Prospect, KY 40059

For customer service inquiries, please send an email to support@electrumcorporation.com, or visit www.electrumcorporation.com/public/privacy.asp.

If you have comments concerning this website's accessibility, please contact us at the email address support@electrumcorporation.com.