

This California Privacy Notice (“**Notice**”) is provided pursuant to the California Consumer Privacy Act (“**CCPA**”) and describes how Ministry Brands Holdings, LLC and our family of companies (collectively, “**Ministry Brands**”, “**we**”, “**us**”, or “**our**”) process the Personal Information of California consumers through our websites, including, but not limited to, [ministrybrands.com](https://ministrybrands.com), other Ministry Brands affiliated websites, and affiliates whose websites and mobile applications link to this Policy (collectively, the “**Sites**”). For an overview of the Ministry Brands family of companies and the Sites governed by this Policy, please click [here](#).

This Notice supplements our other privacy policies and notices, including our [Privacy Policy](#). If you are a Ministry Brands employee, please see our California Employee Privacy Notice for additional disclosures. In the event of a conflict between any other policy, statement, or notice and this Notice, this Notice will prevail as to California consumers.

Unless otherwise noted, the disclosures that describe how and why we collect and use your Personal Information also describe how and why we collected and used your Personal Information within the past twelve (12) months.

## **Personal Information We Collect and How We Collect It**

“**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is publicly available, de-identified, or aggregated.

We collect the following categories of Personal Information about California consumers. This information may be, or have been, collected directly from you, automatically when you use our Sites, or from advertising networks, internet service providers, data analytics providers, government entities, social networks, or data brokers. Note that the Personal Information we collect about you may vary depending on the nature of your interactions with us and may not include all of the examples listed below.

- **Identifiers**, including real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, social security number, or other similar identifiers.
- **Personal Information described in Cal. Civ. Code § 1798.80(e)**, including name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, education, employment, employment history, bank account number, credit card number, debit card number, or other financial information.

- **Characteristics of protected classifications** under California or federal law, including age and date of birth, marital status, race, ancestry, ethnic origin, sex, gender, sexual orientation, gender identity, religion or creed, military or veteran status, medical condition, or disability.
- **Commercial information**, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- **Internet or other electronic network activity information**, including Internet or other similar activity, browsing history, search history, information on a consumer's interaction with our Sites, application logs, device data and registration, social media account information, or advertisement.
- **Geolocation data**, including location data inferred from your device IP address.
- **Audio, electronic, visual, thermal, olfactory, or similar information**, including photographs and video of you, and audio recordings as may relate to your application.
- **Professional or employment-related information**, including employer; skills, qualifications, work experience, references, recommendations, and other information included in a resume, CV, application form, or cover letter; answers to behavioral or other screening questions in an application or interview; information contained in any personal webpages or documents you choose to share with us; information relating to professional licenses, training, disciplinary actions, and membership in professional organizations; and information relating to membership in civic organizations.
- **Non-public education information**, including school(s) attended, grades, transcripts, record of attendance, disciplinary records, or other information relating to your secondary and post-secondary education.
- **Inferences** used to create a profile reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- **Sensitive Personal Information**, including Personal Information that reveals a consumer's religious or philosophical beliefs.
- **Additional categories.** We also collect some Personal Information that does not directly fit within one of the categories defined by the CCPA. For example, we collect the contents of communications you send to us; citizenship; immigration, visa status, and work authorization information; and languages spoken.

We do not use or disclose Sensitive Personal Information for purposes to which the right to limit

use and disclosure applies under the CCPA.

## Purposes for Which We Collect Your Personal Information

We use, and have used, the Personal Information we collect for the following purposes:

- **Provide access to, secure, and improve the Sites**, which may include facilitating and personalizing your user experience; monitoring and analyzing trends, usage, and activities of Site visitors and users; delivering promotional content; improving the Sites; providing technical support; and preventing, identifying, and stopping suspected or actual fraudulent or illegal activity, or any activity that violates our policies.
- **Provide services to our Clients**, such as managing Client access to our Sites, fulfilling requests related to Client-held information, and otherwise providing requested services or products.
- **Payment services**, which may include facilitating online payment transactions, providing information about past payments, and generating receipts.
- **Communications**, such as using contact details to provide information about our products and services and our Clients, business partners, and affiliates' services, inviting you to participate in our events or surveys, or otherwise communicating with you. As permitted by applicable law, we may use your Personal Information to advertise and market our products and services to you.
- **Fraud detection services**, which may include using your Personal Information to detect and prevent fraud against us and our Clients, including to detect unauthorized log-ins.
- **Compliance**. We may use Personal Information to comply with applicable laws, regulations, or legal processes, industry standards, and Ministry Brands' policies.

## How Long We Keep Your Personal Information

We keep the categories of Personal Information described above for as long as is necessary for the purposes described in this Notice or otherwise authorized by law. This generally means holding the information for as long as one of the following apply:

- Your Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information;
- Your Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected;

- Your Personal Information is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your Personal Information by applicable laws or regulations.

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our information retention policies, please contact us using the contact details below.

## **How We Disclose, Share, and Sell Personal Information**

### **Sales and Sharing of Personal Information**

Under California law, a “sale” of Personal Information does not necessarily involve an exchange of money. Instead, a sale also includes disclosures of Personal Information to third parties who may use the information for their own purposes, such as cookie providers. Similarly, under California law, “sharing” Personal Information refers to disclosing of Personal Information to third parties for cross-context behavioral advertising. In this context we sell and share the following categories of Personal Information:

- Identifiers
- Personal Information described in Cal. Civ. Code § 1798.80(e)
- Internet or other electronic network activity information
- Geolocation data
- Inferences

We have sold and shared Personal Information to third parties, including our vendors and other third parties for cross-context behavioral advertising and other marketing and advertising services that we utilize on our Sites. We do not have actual knowledge that we sell or share the Personal Information of consumers under 16 years of age.

### **Disclosures for a Business or Commercial Purpose**

We disclose the above categories of Personal Information to our service providers and contractors for the following business purposes.

- Auditing related to ad impressions.

- Ensuring security and integrity of Personal Information.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use, including, but not limited to, nonpersonalized advertising.
- Performing services on our behalf.
- Providing advertising and marketing services (except for cross-context behavioral advertising).
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us.
- Processing, maintaining, or collecting Personal Information on our behalf.
- Detecting or protecting against malicious, deceptive, fraudulent, or illegal activity.
- For internal use by the service provider.

## **Privacy Rights Relating to Your Personal Information**

If you are a resident of California, you have the right to submit certain requests relating to your Personal Information as described below. To exercise any of these rights, please submit a request through our [webform](#) or call us at 1-844-916-1301. Please note that, if you submit a request to know, request to delete, or request to correct, you will be asked to provide two to three pieces of Personal Information that we will match against our records to verify your identity. You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed. An authorized agent may submit a request on your behalf using the webform or toll-free number listed above.

**Right to Know.** You have the right to know what Personal Information we have collected about you, which includes:

- (1) The categories of Personal Information we have collected about you, including
  - The categories of sources from which the Personal Information was collected
  - Our business or commercial purposes for collecting, selling, sharing, or disclosing Personal Information
  - The categories of recipients to which we disclose Personal Information
  - The categories of Personal Information that we sold, and for each category identified, the categories of third parties to which we sold that particular category of Personal Information

- The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information

(2) The specific pieces of Personal Information we have collected about you

**Right to Delete Your Personal Information.** You have the right to request that we delete Personal Information we collected from you, subject to certain exceptions.

**Right to Correct Inaccurate Information.** If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.

**Right to Opt Out of Sales and Sharing of Personal Information.** You have the right to opt out of the sale of your Personal Information, and to request that we do not share your Personal Information for cross-context behavioral advertising. To opt-out, please click [here](#).

**Rights Related to Automated Decision-Making.** You have the right to opt out of automated decision-making, including profiling, that we use to evaluate certain personal aspects relating to your performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.

**Right to Non-Discrimination for the Exercise of Your Privacy Rights.** If you choose to exercise any of your privacy rights under the CCPA, you also have the right not to receive discriminatory treatment by us.

## **How to Contact Us**

If you have any questions about how we handle your Personal Information, please contact us via our [webform](#) or at:

Phone: 865-329-6192

Email: [privacy@ministrybrands.com](mailto:privacy@ministrybrands.com)