

California Consumer Privacy Act Notice and Policy

Effective date: January 1, 2021

This is the California Consumer Privacy Act of 2018 (“CCPA”), Notice and Policy (“CCPA Policy”) for Vinci Brands LLC (hereinafter, each the “Company” or collectively the “Companies”) which provides certain information to California residents about the Companies’ data processing practices that is supplemental to the disclosures in each Company’s Privacy Policy.

If you have a visual disability, you may be able to use a screen reader or other text-to-speech or text-to-Braille tool to review the contents of this CCPA Policy.

Scope

In this CCPA Policy, the Company provides disclosures for the 12 months preceding January 1, 2020 as required by the CCPA for California residents who are not acting as a job applicant or employee nor those who constitute an owner, director, officer, or contractor of a company, partnership, sole proprietorship, non-profit, or government agency (a “Business Representative”) with whom the Company is conducting business transactions.

Right to Know About Personal Information Collected, Disclosed, or Sold

The Company does not and will not sell California residents’ personal information. This applies to all California residents covered by this CCPA Policy, including minors under 16 years of age.

California residents have the right to request that we disclose what personal information we collect, use, disclose and sell about you specifically (“right to know”). To submit a request to exercise the right to know, submit an email request to CCPArequests@vincibrands.com and include “California Request to Know” in the subject line. Please specify in your request the details you would like to know, including any specific pieces of personal information you would like to access.

We will ask that you provide certain information to verify your identity, such as a code sent to an email address we may have on file for you/that you provide for this purpose or we may contact you by phone to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. We will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

Our Personal Information Handling Practices in 2019

We have set out below the categories of personal information we have collected about California residents in the preceding 12 months and, for each category of personal information collected, the categories of sources from which that information was collected, the business or commercial purposes for which the information was collected, and the categories of third parties with whom we shared the personal information.

CATEGORY	WE COLLECTED SUCH PERSONAL INFORMATION TO USE FOR THE FOLLOWING BUSINESS OR COMMERCIAL PURPOSES:	WE HAVE COLLECTED SUCH PERSONAL INFORMATION FROM THE FOLLOWING CATEGORIES OF SOURCES:
<p>A. Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, signature, physical characteristics or description, telephone number or credit card number.</p>	<p>To complete a transaction, provide a good or service required;</p> <p>To detect or protect against security incidents a malicious deceptive, fraudulent or illegal activity;</p> <p>To debug or identify and repair errors that impair functionality of our website;</p> <p>To permit the exercise of free speech (i.e., customer reviews; or</p> <p>To permit the exercise of free speech (i.e., customer reviews; or</p> <p>To comply with a legal obligation, including data and records retention requirements.</p>	<p>Directly from California residents.</p>
<p>B. Images or Videos.</p>	<p>To detect or protect against security incidents.</p>	<p>Directly from California residents that visit our physical location(s).</p>
<p>C. Commercial information, including services purchased, obtained or considered, or other purchasing or consuming histories or tendencies.</p>	<p>To complete a transaction, provide a good or service required by the person;</p> <p>To detect or protect against security incidents an malicious deceptive, fraudulent or illegal activity;</p> <p>To debug or identify and repair errors that impair functionality; or</p> <p>To provide a more customized web experience and to understand site usage and improve the content and offerings of the site.</p>	<p>Directly from California residents or third-party service providers.</p>
<p>D. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.</p>	<p>To complete a transaction, provide a good or service required by the person;</p> <p>To detect or protect against security incidents an malicious deceptive, fraudulent or illegal activity;</p> <p>To debug or identify and repair errors that impair functionality; or</p> <p>To provide a more customized web experience and to understand site usage and improve the content and offerings of the site.</p>	<p>Directly from California residents or third-party service providers.</p>

<p>E. Geolocation data.</p>	<p>To complete a transaction, provide a good or service required by the person;</p> <p>To detect or protect against security incidents an malicious deceptive, fraudulent or illegal activity;</p> <p>To debug or identify and repair errors that impair functionality; or</p> <p>To provide a more customized web experience and to understand site usage and improve the content and offerings of the site.</p>	<p>Directly from California residents that visit our physical location(s).</p>
<p>F. Audio, electronic, visual or similar information.</p>	<p>To detect or protect against security incidents.</p>	<p>Directly from California residents that visit our physical location(s).</p>
<p>G. Professional or employment-related information.</p>	<p>To complete a transaction, provide a good or service required by the person.</p>	<p>Directly from California residents.</p>
<p>H. Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).</p>	<p>To complete a transaction, provide a good or service required by the person.</p>	
<p>I. Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.</p>	<p>To complete a transaction, provide a good or service required by the person;</p> <p>To detect or protect against security incidents an malicious deceptive, fraudulent or illegal activity;</p> <p>To debug or identify and repair errors that impair functionality; or</p> <p>To provide a more customized web experience and to understand site usage and improve the content and offerings of the site.</p>	<p>Directly from California residents or third-party service providers.</p>

California Consumer Privacy Act (CCPA) Notice At Collection

Under the California Consumer Privacy Act (CCPA), California consumers may be entitled to certain notices and disclosures regarding the collection and use of their Personal Information. This notice is intended to provide the Notice at Collection required under the CCPA.

We may collect Personal Information from you and use it for specified purposes. For a list of Categories of Personal Information that we collect and the Purposes for which we use such Personal Information, see our Privacy Policy.

While we do not sell Personal Information for monetary value, we may disclose Personal Information to third parties, such as service providers.

Right to Request Deletion of Personal Information

California residents have a right to request the deletion of personal information that we collect or maintain about you. To submit a request to delete personal information, submit an email request to CCPArequests@vincibrands.com and include "California Request to Delete" in the subject line. Please specify in your request the personal information about you that you would like to have deleted, which can be all of your personal information as required by the CCPA.

We will ask that you provide certain information to verify your identity, such as a code sent to an email address, we may have on file for you/that you provide to us for this purpose. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Once we have verified your identity, we will ask you to confirm that you wish to have your personal information deleted. Once your request to have your personal information has been confirmed, we will respond to your request in accordance with the CCPA. If we deny your request, we will provide an explanation for that denial.

Right to Opt-Out of the Sale of Personal Information

The California Consumer Privacy Act (CCPA) provides you with rights regarding how your data or personal information is treated. Under the legislation, California residents can choose to opt out of the "sale" of their personal information to third parties. Based on the CCPA definition, "sale" refers to data collection for the purpose of creating advertising and other communications. [Learn more about CCPA and your privacy rights.](#)

How to opt out

By clicking on the link below, we will no longer collect or sell your personal information. This applies to both third-parties and the data we collect to help personalize your experience on our website or through other communications. For more information, view our privacy policy.

[Do not sell my personal information.](#)

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

You may not be discriminated against because you exercise any of your rights under the CCPA.

Authorized Agent

California residents can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person, or a business entity registered with the Secretary of State of California; and
- You sign a written declaration that you authorize the authorized agent to act on your behalf.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please have the authorized agent take the following steps in addition to the steps described in Sections 2 and 3 above:

- Mail a certified copy of your written declaration authorizing the authorized agent to act on your behalf to Legal Department, Vinci Brands LLC, 3347 Michelson, Suite 100, Irvine, California 92612; and
- Provide any information we request in our response to your email to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4000 to 4465, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

Contact for More Information

If you have questions or concerns regarding our privacy policy or practices, you may contact us using the following details:

Email address: legal@vincibrands.com

Last Updated: June 8, 2022