

CCPA Privacy Policy

This privacy notice section for California residents supplements the information contained in our Privacy Policy For Contests And Sweepstakes and it applies solely to all visitors, users, and others who reside in the State of California.

Categories of Personal Information Collected

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device. The following is a list of categories of personal information which we may collect or may have been collected from California residents within the last twelve (12) months.

Please note that the categories and examples provided in the list below are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact collected by us, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been collected. For example, certain categories of personal information would only be collected if you provided such personal information directly to us.

- **Category A: Identifiers.**

Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, social media handles, account name, or other similar identifiers.

Collected: Yes.

- **Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).**

Examples: A name, social media handle, signature, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

Collected: Yes.

- **Category C: Protected classification characteristics under California or federal law.**

Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or

mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Collected: Yes.

- **Category D: Commercial information.**

Examples: Records and history of products or services purchased or considered.

Collected: No.

- **Category E: Biometric information.**

Examples: Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

Collected: No.

- **Category F: Internet or other similar network activity.**

Examples: Interaction with our service or advertisement.

Collected: Yes.

- **Category G: Geolocation data.**

Examples: Approximate physical location.

Collected: No.

- **Category H: Sensory data.**

Examples: Audio, electronic, visual, thermal, olfactory, or similar information.

Collected: No.

- **Category I: Professional or employment-related information.**

Examples: Current or past job history or performance evaluations.

Collected: No.

- **Category J: Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).**

Examples: Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

Collected: No.

- **Category K: Inferences drawn from other personal information.**

Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Collected: No.

Under CCPA, personal information does not include:

- Publicly available information from government records
- Deidentified or aggregated consumer information
- Information excluded from the CCPA's scope, such as:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data
 - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994

Sources of Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

- **Directly from you.** For example, from the forms you complete on our Website, preferences you express or provide through our Website.
- **Indirectly from you.** For example, from observing Your activity on our Website.
- **Automatically from you.** For example, through cookies we or our Website Providers set on your device as you navigate through our Website.
- **From Service Providers.** For example, or other third-party vendors that we use to provide the website to you.

Use of Personal Information for Business Purposes or Commercial Purposes

We may use or disclose personal information we collect for "business purposes" or "commercial purposes" (as defined under the CCPA), which may include the following examples:

- To operate our Contest Services and provide you with our Contest Services.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our Contest Services.

- To fulfill or meet the reason you provided the information. For example, if you share your contact information to ask a question about our Contest Services, we will use that personal information to respond to your inquiry.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- For internal administrative and auditing purposes.
- To detect security incidents and protect against malicious, deceptive, fraudulent or illegal activity, including, when necessary, to prosecute those responsible for such activities.

Please note that the examples provided above are illustrative and not intended to be exhaustive. For more details on how we use this information, please refer to the "Use of Your Personal Data" section.

If we decide to collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes we will update this Privacy Policy.

Disclosure of Personal Information for Business Purposes or Commercial Purposes

We may use or disclose and may have used or disclosed in the last twelve (12) months the following categories of personal information for business or commercial purposes:

- Category A: Identifiers
- Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Category F: Internet or other similar network activity

Please note that the categories listed above are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact disclosed, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been disclosed.

When we disclose personal information for a business purpose or a commercial purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

Sale of Personal Information

As defined in the CCPA, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in

writing, or by electronic or other means, a consumer's personal information by the business to a third party for valuable consideration. This means that we may have received some kind of benefit in return for sharing personal information, but not necessarily a monetary benefit.

Please note that the categories listed below are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact sold, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been shared for value in return.

We may sell and may have sold in the last twelve (12) months the following categories of personal information:

- Category A: Identifiers
- Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Category F: Internet or other similar network activity

Share of Personal Information

We may share your personal information identified in the above categories with the following categories of third parties:

- Service Providers
- Our affiliates
- Our business partners
- Third party vendors to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you

Your Rights under the CCPA

The CCPA provides California residents with specific rights regarding their personal information. If you are a resident of California, you have the following rights:

- **The right to notice.** You have the right to be notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.
- **The right to request.** Under CCPA, you have the right to request that we disclose information to you about our collection, use, sale, disclosure for business purposes and share of personal information. Once we receive and confirm your request, we will disclose to you:
 - The categories of personal information we collected about you
 - The categories of sources for the personal information we collected about you

- Our business or commercial purpose for collecting or selling that personal information
- The categories of third parties with whom we share that personal information
- The specific pieces of personal information we collected about you
- If we sold your personal information or disclosed your personal information for a business purpose, we will disclose to you:
 - The categories of personal information categories sold
 - The categories of personal information categories disclosed
- **The right to say no to the sale of Personal Data (opt-out).** You have the right to direct us to not sell your personal information. To submit an opt-out request please contact us .
- **The right to delete Personal Data.** You have the right to request the deletion of your Personal Data, subject to certain exceptions. Once we receive and confirm your request, we will delete (and direct our Service Providers to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retaining the information is necessary for us or our Service Providers to:
 - Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - Debug products to identify and repair errors that impair existing intended functionality.
 - Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
 - Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
 - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
 - Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
 - Comply with a legal obligation.
 - Make other internal and lawful uses of that information that are compatible with the context in which you provided it.
- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of your consumer's rights, including by:
 - Denying goods or services to you
 - Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties

- Providing a different level or quality of goods or services to you
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services

Exercising Your CCPA Data Protection Rights

In order to exercise any of your rights under the CCPA, and if you are a California resident, you can contact us:

- By email: recht@mgb.ch

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable request related to your personal information.

Your request to us must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it

We cannot respond to your request or provide you with the required information if we cannot:

- Verify your identity or authority to make the request
- And confirm that the personal information relates to you

We will disclose and deliver the required information free of charge within 45 days of receiving your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

Any disclosures we provide will only cover the 12-month period preceding the verifiable request's receipt.

For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

Do Not Sell My Personal Information

You have the right to opt-out of the sale of your personal information. Once we receive and confirm a verifiable consumer request from you, we will stop selling your personal information. To exercise your right to opt-out, please contact us by email at

recht@mgb.ch or you may submit a request here
<https://forms.gle/DeXq2WYfGgcrbFEw8>

"Do Not Track" Policy as Required by California Online Privacy Protection Act (CalOPPA)

Our Contest Services does not respond to Do Not Track signals.

However, some third party websites do keep track of your browsing activities. If you are visiting such websites, you can set your preferences in your web browser to inform websites that you do not want to be tracked. you can enable or disable DNT by visiting the preferences or settings page of your web browser.

Your California Privacy Rights (California's Shine the Light law)

Under California Civil Code Section 1798 (California's Shine the Light law), California residents with an established business relationship with us can request information once a year about sharing their Personal Data with third parties for the third parties' direct marketing purposes.

If you'd like to request more information under the California Shine the Light law, and if you are a California resident, you can contact us using the contact information provided below.

Migros-Genossenschaft-Bund
Direction Legal & Compliance
Limmatstrasse 152
8031 Zürich
Switzerland

Email: recht@mgb.ch
Phone: +41 58 570 24 77