

Effective as of January 11, 2024

**California Notice at Collection:** See the California privacy rights section below for important information about your rights under applicable state privacy laws.

This “Privacy Policy” describes the privacy practices of The Irvine Company LLC and our subsidiaries and affiliates (collectively, “Irvine”, “we”, “us”, or “our”) in connection with the [www.irvinecompany.com](http://www.irvinecompany.com) website, the Irvine mobile application, any other online properties or services that we own or control and which posts or links to this Privacy Policy, and other aspects of Irvine’s business including our offline interactions and physical locations, and our products and services related thereto (collectively, the “Sites”). This Privacy Policy also describes the rights and choices available to individuals with respect to their information. Irvine may provide additional or supplemental privacy policies to individuals for specific interactions at the time we collect personal information, such as employment interactions. These supplemental privacy policies will govern how we may process the information in the context of the specific interaction.

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## Personal Information We Collect

- **Information you provide to us.** Personal information you provide to us through the Sites or otherwise includes:
- **Business and personal contact information**, such as your first and last name, email and mailing addresses, home phone number, mobile phone number, professional title, employer name, or work address.
- **Content you choose to upload to the Sites**, such as text, images, audio, and video, along with the metadata associated with the files you upload.
- **Profile information**, such as your username and password that you may set to establish an online account with us, and other similar information such as your photograph.

- **Registration Information**, such as information that may be related to a service, an account or an event for which you register.
- **Feedback or correspondence**, such as information you provide when you contact us with questions, feedback, or otherwise correspond with us online.
- **Demographic Information**, such as your city, state, country of residence, postal code, gender, and age.
- **Financial information**, such as your stated income, financial account number, or payment card information.
- **Government-issued identification numbers**, such as a national identification number (e.g., Social Security Number, tax identification number, passport number), state or local identification number (e.g., driver's license or state ID number), and an image of the relevant identification card. With your consent, we may use this government-issued identification information and your Biometric Information, namely scans of your face or facial geometry, to verify your identity.
- **Precise geolocation information**, such as from your access fob or when you authorize our mobile application or website to access your location.
- **Transaction information**, such as information about payments to and from you and other details of products or services you have purchased from us such as billing and shipping information.
- **Usage information**, such as information about how you use the Sites and interact with us, including information associated with your access fob or any content you upload to the websites or otherwise submit to us, and information you provide when you use any interactive features of the Sites.
- **Marketing information**, such as your preferences for receiving communications about our activities, events, and publications, and details about how you engage with our communications

Other information that we may collect which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

**Information we obtain from social media platforms.** We may maintain pages for Irvine on social media platforms, such as Facebook, LinkedIn, Twitter, Google, YouTube, Instagram, and other third party platforms. When you visit or interact with our pages on those platforms, the platform provider's privacy policy will apply to your interactions and their collection, use and processing of your personal information. You or the platforms may provide us with information through the platform, and we will treat such information in accordance with this Privacy Policy. If you choose to log in to the Sites through a social network or other third party platform, or otherwise connect your account on a third party platform to your account through the Sites, we may collect information about you from that platform or network. For example, this information may include your username, user ID, profile picture, cover photo, email address and other contact information, and your affiliations (e.g., school, workplace). You may also have the opportunity to provide us with additional information through the third party platform, such as a list of your friends or connections. Read more about third party platforms in the Your Choices section below.

**Information we obtain from other third parties.** We may receive personal information about you from third-party sources. For example, a business partner may share your contact information with us if you have expressed interest in learning specifically about our products or services, or the types of products or services we offer. We may also obtain your personal information from other third parties, such as

service providers you directly interact with (e.g., Jumio as further discussed in the Section entitled “Biometric Information / Identity Verification” below), marketing partners, publicly-available sources and data providers.

**Cookies and Other Information Collected by Automated Means.** We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, your access fob, and activity occurring on or through the Sites, including but not limited, your computer or mobile device operating system type and version number, manufacturer and model, device identifier (such as the Google Advertising ID or Apple ID for Advertising), browser type, screen resolution, IP address, your media access control (MAC) address, the website you visited before browsing to our website, general location information such as city, state or geographic area; information about your use of and actions on the Sites, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access; and other personal information. Our service providers and business partners may collect this type of information over time and across third-party websites and mobile applications.

On our webpages, this information is collected using cookies, browser web storage (also known as locally stored objects, or “LSOs”), web beacons, and similar technologies, and our emails may also contain web beacons. In our mobile application, we may collect this information directly or through our use of third-party software development kits (“SDKs”). SDKs may enable third parties to collect information directly from our mobile applications.

A “cookie” is a text file that websites and apps send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. Browser web storage, or LSOs, are used for similar purposes as cookies. Browser web storage enables the storage of a larger amount of data than cookies. A “web beacon,” also known as a pixel tag or clear GIF, is typically used to demonstrate that a webpage was accessed or that certain content was viewed, typically to measure the success of our marketing campaigns or engagement with our emails and to compile statistics about usage of our websites. A SDK is third-party computer code that we may incorporate into our websites and mobile applications that may be used for a variety of purposes, including to provide us with analytics regarding the use of our mobile applications, to integrate with social media, add features or functionality to our app, or to facilitate online advertising.

Web browsers may offer users of our websites or mobile apps the ability to disable receiving certain types of cookies; however, if cookies are disabled, some features or functionality of our websites may not function correctly. Please see the “Targeted online advertising” section for information about how to exercise choice regarding the use of browsing behavior for purposes of targeted advertising.

Web browsers may offer users of our websites or mobile apps the ability to disable receiving certain types of cookies; however, if cookies are disabled, some features or functionality of our websites may not function correctly. Please see the “Targeted online advertising” section for information about how to exercise choice regarding the use of browsing behavior for purposes of targeted advertising.

*Session-replay technologies.* As part of the Information Collected by Automated Means, we utilize session replay technologies such as those provided by CrazyEgg that employ software code to record users' interactions with the Services in a manner that allows us to watch video replays of those user sessions. The replays include users' clicks, mobile app touches, mouse movements, scrolls and keystrokes/key touches during those sessions. These replays help us diagnose usability problems and identify areas for improvement. You can learn more about CrazyEgg at <https://www.crazyegg.com/privacy> and you can opt-out of session recording by CrazyEgg at <https://www.crazyegg.com/opt-out>.

**Referrals.** Users of the Sites may have the opportunity to refer contacts to us. If you are an existing user, you may only submit a referral if you have permission to provide the referral's contact information to us so that we may contact them.

### **Biometric Information / Identity Verification**

From time to time, we, or through our service provider as further discussed below, may collect a picture of your ID and certain Biometric Information from your face for identity verification when you tour an Irvine property (either in-person or virtually), to maintain the security of our physical properties, and to prevent fraud. The ways in which we collect, use, store, and share that Biometric Information are governed by the [Irvine Company Biometric Privacy Policy](#) and [Irvine Company Biometric Terms](#). Please note, this process is powered by Jumio, a service provider to Irvine. In addition to this Privacy Policy, Irvine's Biometric Privacy Policy, and the Irvine Biometric Terms, [Jumio's Privacy Policy for Online Services](#) may apply to additional types of information collected by Jumio during the identity verification process, such as GPS coordinates or IP address, which may be controlled by Jumio. To learn more about Jumio's privacy practices, please see [Jumio's Privacy Policy for Online Services](#).

## **How We Use Your Personal Information**

We may use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

**To operate the Sites.** We use your personal information to:

- provide, operate and improve the Sites and our products and services
- provide information about our products and services
- establish and maintain your user profile related to the Sites
- administer and process payments
- to verify your identity, maintain the security of our Sites and physical properties, and to prevent fraud
- facilitate your to login to the Sites via third-party identity and access management providers, such as Facebook
- fulfill orders (including confirmation and shipment)

- enable security features of the Sites, such as by sending you security codes via email or SMS, and remembering devices from which you have previously logged in
- communicate with you about the Sites, including by sending you announcements, updates, security alerts, and support and administrative messages
- communicate with you about events or contests in which you participate
- understand your needs and interests, and personalize your experience with the Sites and our communications
- provide support and maintenance for the Sites
- to respond to your requests, questions and feedback

**For research and development.** We analyze use of the Sites to improve the Sites and our products and services, and to develop new products and services, including by studying user demographics and use of the Sites.

**To send you marketing and promotional communications.** We may send you Irvine-related marketing communications as permitted by law. You will have the ability to opt-out of our marketing and promotional communications as described in the Opt out of marketing section below.

**To display advertisements.** We work with advertising partners to display advertisements on the Sites or elsewhere online and offline. These advertisements are delivered by our advertising partners and may be targeted based on your use of the Service or your activity elsewhere online. To learn more about your choices in connection with advertisements, please see the section below titled “Targeted online advertising.”

**To comply with law.** We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities or others.

**For compliance, fraud prevention, and safety.** We may use your personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) protect our, your or others’ rights, privacy, safety or property (including by making and defending legal claims); (b) enforce the terms and conditions that govern the Sites and our products and services; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

**With your consent.** In some cases we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

**To create anonymous, aggregated or de-identified data.** We may create anonymous, aggregated or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated or de-identified data by removing information that makes the data personally identifiable to you. We may use this anonymous, aggregated or de-identified data and share it with third parties for our lawful business purposes, including to analyze and improve the Sites and our products and services, and promote our business and will not attempt to reidentify any such data.

**Cookies and similar technologies.** In addition to the other uses included in this section, we may use the Cookies and similar technologies described above for the following purposes:

- **Technical operation.** To allow the technical operation of the Service, including to honor your privacy and other preferences.
- **Functionality.** To enhance the performance and functionality of our services.
- **Advertising.** To help our third-party advertising partners collect information about how you use the Service and other online services over time, which they use to show you ads on other online services they believe will interest you and measure how the ads perform.
- **Analytics.** To help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails. For example, we use Google Analytics for this purpose. You can learn more about Google Analytics and how to prevent the use of Google Analytics relating to your use of our sites here: <https://tools.google.com/dlpage/gaoptout?hl=en>.

**Events, promotions and contests.** We may use your personal information to:

- administer promotions and contests
- communicate with you about promotions or contests in which you participate
- contact or market to you after collecting your personal information at an event

**Service improvement and analytics.** We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services.

## How We Share your Personal Information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection:

**Affiliates.** We may share your personal information with our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

**Service providers.** We may share your personal information with third party companies and individuals that provide services on our behalf or help us operate the Sites (such as customer support, hosting, analytics, shipping, payment processing, email delivery, marketing, , and database management services). These third parties may use your personal information only as directed or authorized by us and are prohibited from using or disclosing your information for any other purpose, unless otherwise stated herein. Where appropriate under applicable law, we may obtain your consent before sharing with our service providers.

**Advertising partners.** Third-party advertising companies to display advertisements on the Sites or elsewhere online and offline, as described above.

**Business and marketing partners.** We may sometimes share your personal information with partners or enable partners to collect information directly via our Sites. For example, we may share your personal

information to selected third party entities that may review and use that information to send email messages or contact you in other ways to provide information to you about their products and services. These third parties include, without limitation, residential homebuilders and other businesses.

**Payment processors.** Any payment card information you use to make a purchase on the Service is collected and processed directly by our payment processors, such as PayPal and Stripe. PayPal may use your payment data in accordance with its privacy policy, <https://www.paypal.com/us/webapps/mpp/ua/privacy-full>. You may also sign up to be billed by your mobile communications provider, who may use your payment data in accordance with their privacy policies. Stripe may use your payment data in accordance with its privacy policy, <https://stripe.com/privacy>.

**Professional advisors.** We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

**For compliance, fraud prevention and safety.** We may share your personal information for the compliance, fraud prevention and safety purposes described above.

**Business transfers.** We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.

**Text Messaging.** If you opt in to receive text messages from us, we will not share your phone number or information about your consent to receive text messages with third parties that may independently use such information for the purpose of sending you text messages.

## Your Choices

In this section, we describe the rights and choices available to all users. Users who are located in California can find additional information about their rights below.

**Access or Update Your Information.** If you have registered for an account with us, you may review and update certain personal information in your account profile by logging into the account.

**Opt out of marketing communications.** You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us at [privacy@irvinecompany.com](mailto:privacy@irvinecompany.com). Please note that such requests may take up to ten (10) business days to become effective. You may continue to receive service-related and other non-marketing emails. If you receive marketing text messages from us, you may be able to opt out of receiving further marketing text messages from us by replying STOP to our marketing message, or by contacting us at [privacy@irvinecompany.com](mailto:privacy@irvinecompany.com).

**Cookies & Browser Web Storage.** We may allow service providers and other third parties to use cookies and similar technologies to track your browsing activity over time and across the Sites and third party websites. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note

that if you set your browser to disable cookies, the Sites may not work properly. Similarly, your browser settings may allow you to clear your browser web storage.

**Blocking images/clear gifs.** Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

**Location data settings.** Users of our mobile application also have the choice whether to allow us to access your precise location data, unless otherwise noticed. Your device settings may provide the ability for you to revoke our ability to access location data.

**Targeted online advertising.** Some of the business partners that collect information about users' activities on or through the Sites may be members of organizations or programs that provide choices to individuals regarding the use of their browsing behavior or mobile application usage for purposes of targeted advertising.

For each particular device, individuals may opt out of receiving targeted advertising on websites through members of the Network Advertising Initiative by clicking [here](#) or the Digital Advertising Alliance by clicking [here](#). Users of our mobile applications may opt out of receiving targeted advertising in mobile apps through participating members of the Digital Advertising Alliance by installing the AppChoices mobile app, available [here](#), and selecting the user's choices. Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked above.

In addition, your mobile device settings may provide functionality to limit our, or our partners', ability to engage in ad tracking or targeted advertising using the Google Advertising ID or Apple ID for Advertising associated with your mobile device.

If you choose to opt-out of targeted advertisements, you will still see advertisements online but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online behavioral advertising are included in this list, so you may still receive some cookies and tailored advertisements from companies that are not listed.

**Do Not Track.** Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

**Choosing not to share your personal information.** Where we are required by law to collect your personal information, or where we need your personal information in order to provide our products and services to you or enable the use of the Sites, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with our products or services or the use of our Sites. We will tell you what information you must provide to receive our products and services to you or enable your use of Sites by designating it as required at the time of collection or through other appropriate means.

## **Other sites, mobile applications and services**

The Sites may contain links to other websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any



third party. In addition, our content may be included on web pages or in mobile applications or online services that are not associated with us. We do not control third party websites, mobile applications or online services, and we are not responsible for their actions. Other websites, mobile applications and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

## **Security practices**

The security of your personal information is important to us. We employ a number of organizational, technical and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

## **International data transfers**

We are headquartered in the United States and have service providers in other countries, and your personal information may be transferred to the United States or other locations outside of your state, province, or country where privacy laws may not be as protective as those in your state, province, or country. By using the Irvine websites or applications from outside the United States, you expressly consent to transfer of information outside of your country. Those who choose to access the websites or applications from locations outside of the United States do so on their own initiative, and are responsible for compliance with local laws if and to the extent local laws are applicable, including, without limitation, all applicable laws, rules and regulations regarding the transmission of data exported to the United States or from the country in which you reside.

## **Children**

Irvine is committed to protecting the privacy of children. Irvine's websites and mobile applications are directed to persons 18 years of age or older. As a general rule, children are not allowed to use the Sites, and we do not collect personal information from them. We define "children" as anyone under 13 years old. If we learn that we have collected personal information of a child without the consent of the child's parent or guardian, we will delete it. We encourage parents with concerns to contact us.

## **Changes to this Privacy Policy**

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Sites. We may, and if required by law will, also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail (if you have an account where we have your contact information) or another manner through the Sites.

Any modifications to this Privacy Policy will be effective upon our posting the new terms and/or upon implementation of the new changes on the Sites (or as otherwise indicated at the time of posting). In all cases, your continued use of the Sites after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy. If you do not accept this Privacy Policy, you must discontinue use of the Sites and related products and services immediately.

## Governing Law

The Privacy Policy shall be governed by, and will be construed under, the laws of the State of California, U.S.A., without regard to choice of law principles.

## How to Contact Us

Please direct any questions or comments about this Policy or privacy practices to: [privacy@irvinecompany.com](mailto:privacy@irvinecompany.com). You may also write to us via postal mail at:

Irvine Company  
Attn: Information  
550 Newport Center Drive, P.O. Box 6370  
Newport Beach, CA 92658-6370

## California privacy rights notice

This section applies only to California residents. It describes how we collect, use and share Personal Information of California residents in operating our business, and their rights with respect to that Personal Information. For purposes of this section, “Personal Information” has the meaning given in the California Consumer Privacy Act of 2018 (“CCPA”) but does not include information exempted from the scope of the CCPA.

**Your California privacy rights.** As a California resident, you have the rights listed below. However, these rights are not absolute and, in certain cases, we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
  - The categories of Personal Information that we have collected.
  - The categories of sources from which we collected Personal Information.
  - The business or commercial purpose for collecting and/or selling Personal Information.
  - The categories of third parties with whom we share Personal Information.
  - Whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information received by each category of third party recipient.
  - Whether we’ve sold or shared your Personal Information, and if so, the categories of Personal Information received by each category of third party recipient.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.

- **Correction.** You can ask us to correct inaccurate Personal Information that we have collected about you.
- **Opt-out.**
  - Opt-out of certain processing for targeted advertising purposes. You can opt-out of certain processing of personal information for targeted advertising purposes.
  - Opt-out of other sales of personal data. You can opt-out of other sales of your Personal Information. In addition, if you direct us not to sell your Personal Information, we will consider it a request pursuant to California’s “Shine the Light” law to stop sharing your personal information covered by that law with third parties for their direct marketing purposes.
- **Opt-in.** If we know that you are younger than 16 years old, we will ask for your permission (or if you are younger than 13 years old, your parent’s or guardian’s permission) to sell your Personal Information before we do so.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination. This means that we will not penalize you for exercising your rights by taking actions such as denying you services; increasing the price/rate of services; decreasing service quality; or suggesting that we may penalize you as described above for exercising your rights.

### How to exercise your rights

You may exercise your California privacy rights described above as follows:

- **Right to information, access, correct, and deletion.** You can request to exercise your access and deletion rights by:
  - calling us toll free at: (866) 576-5850.
  - you can request access to your information here: [Access Request](#)
  - you can request deletion of your information here: [Deletion Request](#)
- **Right to opt-out of the “sale” or “sharing” of your Personal Information.** Like many companies, we use services that help deliver interest-based ads to you. California law classifies our use of these services as a “share” or “sale” of your Personal Information to the companies that provide the services. This is because we allow them to collect information from our website users (e.g., online identifiers and browsing activity) so they can help serve ads more likely to interest you. You can request to opt-out of this “sale” of your personal information here: [Do Not Sell My Personal Information](#). You can request to opt-out of the “sharing” of your personal information here: [Do Not Share My Personal Information](#).

**Verification of Identity; Authorized agents.** We will need to confirm your identity and California residency to process your requests to exercise your information, access or deletion rights. We cannot process your request if you do not provide us with sufficient detail to allow us to verify your identity, and understand and respond to the request. A California resident can empower an “authorized agent” to submit requests on his/her behalf. We will require the authorized agent to have a written authorization confirming that authority.

Please note that the CCPA limits these rights by, for example, prohibiting us from providing certain sensitive information in response to an access request and limiting the circumstances in which we must comply with a deletion request. If we deny your request, we will communicate our decision to you.

**Personal information that we collect, use and share (online, mobile application and website interactions)**

The chart below summarizes how we collect, use and share Personal Information in our online, mobile application and website-based interaction by reference to the statutory categories specified in the CCPA, and describes our practices during the 12 months preceding the effective date of this Privacy Policy. Categories in the chart refer to the categories described above in the general section of this Privacy Policy. We disclose your Personal Information to business transferees.

*Personal information that we collect, use and share (online, mobile application and website interactions)*

Statutory category of personal information (PI)	PI we collect	Source of the PI	Purpose for collection	Categories of third parties to whom we “disclose” the PI for a business purpose	Categories of third parties to whom we “sell” or “Share” the PI
<b>Identifiers</b>	<ul style="list-style-type: none"> <li>• Business and personal contact information</li> <li>• Profile information</li> <li>• Content you choose to upload to the Service</li> <li>• Registration information</li> <li>• Feedback or correspondence</li> <li>• Financial information</li> <li>• Government-issued identification numbers</li> <li>• Transaction information</li> <li>• Marketing information</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Social Media Platforms</li> <li>• Public sources</li> <li>• Business Partners</li> <li>• Data Providers</li> </ul>	<ul style="list-style-type: none"> <li>• Operate the Service</li> <li>• Research &amp; development</li> <li>• Display Advertisements</li> <li>• Marketing and Promotional Communications</li> <li>• Compliance with Law</li> <li>• Compliance, Fraud Prevention &amp; Safety</li> <li>• Create Anonymous, Aggregated or De-identified Data</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Partners</li> <li>• Service Providers</li> <li>• Professional Advisors</li> <li>• Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising partners</li> <li>• Business and marketing partners</li> </ul>

	<ul style="list-style-type: none"> <li>• Usage information</li> <li>• Information you provide in applications or other offline, in-person and telephonic interactions</li> </ul>				
<b>Commercial Information</b>	<ul style="list-style-type: none"> <li>• Business and personal contact information</li> <li>• Profile information</li> <li>• Content you choose to upload to the Service</li> <li>• Registration information</li> <li>• Feedback or correspondence</li> <li>• Financial information</li> <li>• Transaction information</li> <li>• Marketing information</li> <li>• Usage information</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>	<ul style="list-style-type: none"> <li>• Operate the Service</li> <li>• Research &amp; development</li> <li>• Display Advertisements</li> <li>• Marketing and Promotional Communications</li> <li>• Compliance with Law</li> <li>• Compliance, Fraud Prevention &amp; Safety</li> <li>• Create Anonymous, Aggregated or De-identified Data</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Partners</li> <li>• Service Providers</li> <li>• Professional Advisors</li> <li>• Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Financial Information</b>	<ul style="list-style-type: none"> <li>• Financial information</li> <li>• Information you provide in applications or other offline, in-person and telephonic interactions</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Public Sources</li> <li>• Business Partners</li> <li>• Data Providers</li> </ul>	<ul style="list-style-type: none"> <li>• Operate the Service</li> <li>• Research &amp; development</li> <li>• Display Advertisements</li> <li>• Marketing and Promotional Communications</li> <li>• Compliance with Law</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Partners</li> <li>• Service Providers</li> <li>• Professional Advisors</li> <li>• Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>• Business and marketing partners</li> </ul>

			<ul style="list-style-type: none"> <li>• Compliance, Fraud Prevention &amp; Safety</li> <li>• Create Anonymous, Aggregated or De-identified Data</li> </ul>		
<b>Online Identifiers</b>	<ul style="list-style-type: none"> <li>• Device data</li> <li>• Identity data</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Automatic Collection</li> <li>• Business Partners</li> <li>• Data Providers</li> </ul>	<ul style="list-style-type: none"> <li>• Operate the Service</li> <li>• Research &amp; development</li> <li>• Display Advertisements</li> <li>• Marketing and Promotional Communications</li> <li>• Compliance with Law</li> <li>• Compliance, Fraud Prevention &amp; Safety</li> <li>• Create Anonymous, Aggregated or De-identified Data</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Partners</li> <li>• Service Providers</li> <li>• Professional Advisors</li> <li>• Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>• Business and marketing partners</li> </ul>
<b>Biometric Information</b>	<ul style="list-style-type: none"> <li>• Face scans and facial geometry</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>	<ul style="list-style-type: none"> <li>• Provide the Sites and Operate the Service</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service Providers</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
<b>Internet or Network Information</b>	<ul style="list-style-type: none"> <li>• Usage information</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Automatic Collection</li> <li>• Business Partners</li> <li>• Data Providers</li> </ul>	<ul style="list-style-type: none"> <li>• Operate the Service</li> <li>• Research &amp; development</li> <li>• Display Advertisements</li> <li>• Marketing and Promotional Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Partners</li> <li>• Service Providers</li> <li>• Professional Advisors</li> <li>• Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>• Business and marketing partners</li> </ul>

			<ul style="list-style-type: none"> <li>• Compliance with Law</li> <li>• Compliance, Fraud Prevention &amp; Safety</li> <li>• Create Anonymous, Aggregated or De-identified Data</li> </ul>		
<b>Geolocation Data</b>	<ul style="list-style-type: none"> <li>• Usage information</li> <li>• Device data</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Automatic Collection</li> </ul>	<ul style="list-style-type: none"> <li>• Operate the Service</li> <li>• Research &amp; development</li> <li>• Display Advertisements</li> <li>• Marketing and Promotional Communications</li> <li>• Compliance with Law</li> <li>• Compliance, Fraud Prevention &amp; Safety</li> <li>• Create Anonymous, Aggregated or De-identified Data</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Partners</li> <li>• Service Providers</li> <li>• Professional Advisors</li> <li>• Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>• Business and marketing partners</li> </ul>
<b>Inferences</b>	<ul style="list-style-type: none"> <li>• May be derived from:</li> <li>• Business and personal contact information</li> <li>• Profile information</li> <li>• Content you choose to upload to the Service</li> <li>• Registration information</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Automatic Collection</li> <li>• Public Sources</li> <li>• Business Partners</li> <li>• Data Providers</li> </ul>	<ul style="list-style-type: none"> <li>• Operate the Service</li> <li>• Research &amp; development</li> <li>• Display Advertisements</li> <li>• Marketing and Promotional Communications</li> <li>• Compliance with Law</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Partners</li> <li>• Service Providers</li> <li>• Professional Advisors</li> <li>• Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>• Business and marketing partners</li> </ul>

	<ul style="list-style-type: none"> <li>• Feedback or correspondence</li> <li>• Financial information</li> <li>• Government-issued identification numbers</li> <li>• Transaction information</li> <li>• Marketing information</li> <li>• Usage information</li> </ul>		<ul style="list-style-type: none"> <li>• Compliance, Fraud Prevention &amp; Safety</li> </ul>		
<b>Professional or Employment Information</b>	<ul style="list-style-type: none"> <li>• Information you provide in applications or other offline, in-person and telephonic interactions</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Automatic Collection</li> <li>• Public Sources</li> <li>• Business Partners</li> <li>• Data Providers</li> </ul>	<ul style="list-style-type: none"> <li>• Operate the Service</li> <li>• Research &amp; development</li> <li>• Display Advertisements</li> <li>• Marketing and Promotional Communications</li> <li>• Compliance with Law</li> <li>• Compliance, Fraud Prevention &amp; Safety</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Partners</li> <li>• Service Providers</li> <li>• Professional Advisors</li> <li>• Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>• Business and marketing partners</li> </ul>

**Personal information that we collect, use and share (offline, in-person, and telephonic interactions)**

The chart below summarizes how we collect, use and share Personal Information in our offline, in-person and telephonic interactions by reference to the statutory categories specified in the CCPA, and describes our practices during the 12 months preceding the effective date of this Privacy Policy. Categories in the chart refer to the categories described above in the general section of this Privacy Policy. We disclose your Personal Information to business transferees.

*Personal information that we collect, use and share (offline, in-person, and telephonic interactions)*

<b>Statutory category of</b>	<b>PI we collect</b>	<b>Source of the PI</b>	<b>Purpose for collection</b>	<b>Categories of third parties to</b>	<b>Categories of third</b>
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personal information (PI)				whom we “disclose” the PI for a business purpose	parties to whom we “sell” or “Share” the PI
<b>Identifiers</b>	<ul style="list-style-type: none"> <li>• Business and personal contact information</li> <li>• Profile information</li> <li>• Content you choose to upload to the Service</li> <li>• Registration information</li> <li>• Feedback or correspondence</li> <li>• Financial information</li> <li>• Government-issued identification numbers</li> <li>• Transaction information</li> <li>• Marketing information</li> <li>• Usage information</li> <li>• Information you provide in applications or other offline, in-person and telephonic interactions</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Public sources</li> <li>• Business Partners</li> <li>• Data Providers</li> </ul>	<ul style="list-style-type: none"> <li>• Operate the Service</li> <li>• Research &amp; development</li> <li>• Marketing and Promotional Communications</li> <li>• Compliance with Law</li> <li>• Compliance, Fraud Prevention &amp; Safety</li> <li>• Create Anonymous, Aggregated or De-identified Data</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Partners</li> <li>• Service Providers</li> <li>• Professional Advisors</li> <li>• Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising partners</li> <li>• Business and marketing partners</li> </ul>
<b>Commercial Information</b>	<ul style="list-style-type: none"> <li>• Business and personal contact information</li> <li>• Profile information</li> <li>• Content you choose to</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>	<ul style="list-style-type: none"> <li>• Operate the Service</li> <li>• Research &amp; development</li> <li>• Marketing and Promotional</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Partners</li> <li>• Service Providers</li> <li>• Professional Advisors</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>

	<ul style="list-style-type: none"> <li>upload to the Service</li> <li>• Registration information</li> <li>• Feedback or correspondence</li> <li>• Financial information</li> <li>• Transaction information</li> <li>• Marketing information</li> <li>• Usage information</li> </ul>		<ul style="list-style-type: none"> <li>Communications</li> <li>• Compliance with Law</li> <li>• Compliance, Fraud Prevention &amp; Safety</li> <li>• Create Anonymous, Aggregated or De-identified Data</li> </ul>	<ul style="list-style-type: none"> <li>• Governmental authorities and others</li> </ul>	
<b>Financial Information</b>	<ul style="list-style-type: none"> <li>• Financial information</li> <li>• Information you provide in applications or other offline, in-person and telephonic interactions</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Public Sources</li> <li>• Business Partners</li> <li>• Data Providers</li> </ul>	<ul style="list-style-type: none"> <li>• Operate the Service</li> <li>• Research &amp; development</li> <li>• Marketing and Promotional Communications</li> <li>• Compliance with Law</li> <li>• Compliance, Fraud Prevention &amp; Safety</li> <li>• Create Anonymous, Aggregated or De-identified Data</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Partners</li> <li>• Service Providers</li> <li>• Professional Advisors</li> <li>• Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>• Business and marketing partners</li> </ul>
<b>Inferences</b>	<ul style="list-style-type: none"> <li>• May be derived from:</li> <li>• Business and personal contact information</li> <li>• Profile information</li> <li>• Content you choose to upload to the Service</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Public Sources</li> <li>• Business Partners</li> <li>• Data Providers</li> </ul>	<ul style="list-style-type: none"> <li>• Operate the Service</li> <li>• Research &amp; development</li> <li>• Marketing and Promotional Communications</li> <li>• Compliance with Law</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Partners</li> <li>• Service Providers</li> <li>• Professional Advisors</li> <li>• Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>

	<ul style="list-style-type: none"> <li>• Registration information</li> <li>• Feedback or correspondence</li> <li>• Financial information</li> <li>• Government-issued identification numbers</li> <li>• Transaction information</li> <li>• Marketing information</li> <li>• Usage information</li> </ul>		<ul style="list-style-type: none"> <li>• Compliance, Fraud Prevention &amp; Safety</li> </ul>		
<b>Physical Description</b>	<ul style="list-style-type: none"> <li>• Information collected automatically by security cameras and equipment</li> <li>• Information you provide in applications or other offline, in-person and telephonic interactions</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Automatic Collection</li> </ul>	<ul style="list-style-type: none"> <li>• Operate the Service</li> <li>• Compliance with Law</li> <li>• Compliance, Fraud Prevention &amp; Safety</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Partners</li> <li>• Service Providers</li> <li>• Professional Advisors</li> <li>• Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>Education Information</b>	<ul style="list-style-type: none"> <li>• Information you provide in applications or other offline, in-person and telephonic interactions</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Public Sources</li> <li>• Business Partners</li> <li>• Data Providers</li> </ul>	<ul style="list-style-type: none"> <li>• Operate the Service</li> <li>• Research &amp; development</li> <li>• Marketing and Promotional Communications</li> <li>• Compliance with Law</li> <li>• Compliance, Fraud Prevention &amp; Safety</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Partners</li> <li>• Service Providers</li> <li>• Professional Advisors</li> <li>• Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>

<b>Professional or Employment Information</b>	<ul style="list-style-type: none"> <li>Information you provide in applications or other offline, in-person and telephonic interactions</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Public Sources</li> <li>Business Partners</li> <li>Data Providers</li> </ul>	<ul style="list-style-type: none"> <li>Operate the Service</li> <li>Research &amp; development</li> <li>Marketing and Promotional Communications</li> <li>Compliance with Law</li> <li>Compliance, Fraud Prevention &amp; Safety</li> </ul>	<ul style="list-style-type: none"> <li>Service</li> <li>Research &amp; development</li> <li>Marketing and Promotional Communications</li> <li>Compliance with Law</li> <li>Compliance, Fraud Prevention &amp; Safety</li> <li>Affiliates</li> <li>Partners</li> <li>Service Providers</li> <li>Professional Advisors</li> <li>Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>Business and marketing partners</li> </ul>
<b>Sensory Information</b>	<ul style="list-style-type: none"> <li>Information collected automatically by security cameras and equipment</li> </ul>	<ul style="list-style-type: none"> <li>Automatic Collection</li> </ul>	<ul style="list-style-type: none"> <li>Operate the Service</li> <li>Compliance with Law</li> <li>Compliance, Fraud Prevention &amp; Safety</li> </ul>	<ul style="list-style-type: none"> <li>Affiliates</li> <li>Partners</li> <li>Service Providers</li> <li>Professional Advisors</li> <li>Governmental authorities and others</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
<b>Medical Information</b>	<ul style="list-style-type: none"> <li>Information you provide in applications or other offline, in-person and telephonic interactions</li> </ul>	<ul style="list-style-type: none"> <li>You</li> </ul>	<ul style="list-style-type: none"> <li>Operate the Service</li> <li>Compliance with Law</li> <li>Compliance, Fraud Prevention &amp; Safety</li> </ul>	<ul style="list-style-type: none"> <li>Affiliates</li> <li>Partners</li> <li>Service Providers</li> <li>Professional Advisors</li> <li>Governmental authorities and others</li> </ul>	