# **Privacy Policy**



### Last updated: October 25, 2024

Your privacy is important to us. To better protect your privacy, we have created this Privacy Policy to inform you of our information practices and certain choices you can make about the way your information is collected and used by The Change Companies and its subsidiary companies ("we," "us," or "our"). This Privacy Policy applies to your use of our website and any services that we provide. This Privacy Policy does not apply to your use of any websites, tools, applications, or other services offered by third parties. By accessing our services or using our website, you consent to the practices described in this Privacy Policy.

### What Information We Collect

#### 1.1 Personal Information:

You may submit information to us by which you may be personally identified, such as name, title, address, e-mail address, telephone number, date of birth, country, state, country of residence, business operation, or financial information. This is referred to as "Personal Information." We may collect Personal Information from you in various ways, including when you:

- Register an account with us
- Purchase our products or services
- Contact our customer support
- Subscribe to our newsletter or marketing communications
- Participate in surveys or promotional activities
- Use our services

## 1.2 Usage Data:

We may automatically collect certain non-personal information when you visit our website or use our services. This may include your IP address, browser type, device information, operating system, referral source, pages visited, time spent, and other usage details. This is referred to as "Usage Data." We may also use cookies and similar technologies to enhance your browsing experience. You can modify your browser settings to refuse cookies, although this may limit your access to certain features of our website.

## 1.3 Generated Content:

You may create or provide information to us when you interact with our website or any of our services that we provide. This may include written responses, comments, feedback, suggestions, or opinions. We refer to this as "Generated Content."

### How we Use Information

#### 2.1 Personal Information:

We may use the Personal Information we collect for the following purposes:

- Provide and personalize our products and services
- Process and fulfill your orders and transactions
- Communicate with you regarding your account, purchases, and customer support inquiries
- Send you newsletters, updates, and promotional materials (you can unsubscribe at any time)
- Conduct market research, data analysis, and improve our products and services
- Protect against fraudulent or unauthorized transactions and ensure network security
- Comply with applicable laws, regulations, and legal obligations

## 2.2 Usage Data and Generated Content:

We may use Usage Data for any purpose, including providing our website or services to you and improving our website or services. We may use Generated Content for purposes of providing our website or services to

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you and improving our website or services.

## **Information Sharing**

### 3.1 Service Providers:

We may share your Personal Information with trusted third-party service providers who assist us in operating our business, such as payment processors, shipping companies, and marketing platforms. These providers are contractually obligated to maintain the confidentiality and security of your information.

#### 3.2 Business Partners:

In some cases, we may collaborate with business partners or affiliates to offer joint products or services. We may share your personal information with these partners, but only to the extent necessary for providing the requested products or services. We will ensure appropriate safeguards are in place to protect your Personal Information.

## 3.3 Legal Requirements:

We may disclose your Personal Information, Usage Data, and/or Generated Content if required by law, court order, or government regulation. We may also disclose your Personal Information, Usage Data, and/or Generated Content to protect our rights, safety, or property, or to investigate and prevent any violation of any terms applicable to your use of our website or any of our services.

### 3.4 Business Transfers:

In the event of a merger, acquisition, or sale of our company or its assets, your Personal Information, Usage Data, and/or Generated Content may be transferred to the acquiring entity or third party involved. We will ensure the protection and confidentiality of your information during such transactions.

## **Your Choices and Rights**

You have the right to access, update, correct, or delete the information you provide, including Personal Information and Generated Content. You may also contact us to request to access the Personal Information, Usage Data, and Generated Content that we keep about you. We may keep all information in an off-line form, for archival purposes or as otherwise required by law. We will ask you to provide us certain credentials to make sure that you are who you claim to be and to the extent required under the applicable law, will make good-faith efforts to locate the information you request to access to.

## Children's Policy

Our website we provide is intended for individuals who are 18 years old or older. Some services we provide may be used by juveniles as controlled by our clients with appropriate consent. Protecting the privacy of children is important to us. Therefore, we comply with the Children's Online Privacy Protection Act (COPPA), and do not knowingly collect Personal Information *directly* from anyone under the age of eighteen (18) that has not been authorized by a client. If we become aware that we have inadvertently received Personal Information *directly* from a child that was not client authorized, we will delete such information from our records.

## California Specific Laws

### 6.1 California Privacy Protection Act (CCPA):

If you are a resident of California, you have the right: (i) to access the Personal Information we hold about you (also known as the "Right to Know"); (ii) to transfer it to a new service; and (iii) to ask that Personal Information, Usage Data, and/or Generated Content about you be corrected, updated, or erased. If you would like to exercise any of these rights, please contact us at as@changecompanies.net. Exercise of any of these

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rights does not affect your right to use of our website or our services, however, please be aware that our website or services may not function optimally or at all without certain information.

## 6.2 California "Shine the Light" Law (Cal. Civ. Code § 1798.83):

If you are a resident of California, you have the right to know what third parties we disclose your Personal Information to for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please contact us at as@changecompanies.net.

## 6.3 Eraser Law (Cal. SB 568):

California residents under eighteen (18) years of age ("Minor User") have the right to request that we remove content that they post through the use of our website or our services ("Minor Posted Content"). Upon receipt of a removal request from a Minor User, we will use commercially reasonable efforts to remove Minor Posted Content from our website or our services, as applicable. Any such request to remove Minor Posted Content does not ensure or guarantee complete or comprehensive removal of the Minor Posted Content. To request that we remove content, please contact us at as@changecompanies.net.

## **Data Security**

We take reasonable measures to protect the information we collect and maintain. We implement technical, administrative, and physical safeguards to secure your data from unauthorized access, disclosure, alteration, and destruction. However, no data transmission or storage can guarantee 100% security. We cannot warrant the absolute security of any information you transmit to us or store on our systems.

## **Changes to this Privacy Policy**

From time to time, we may update this Privacy Policy. We reserve the right, in our sole discretion, to modify this Privacy Policy at any time by posting a revised Privacy Policy on our website with an updated date. For significant changes, we will provide a banner notification our website and services, where practical. You are responsible for reviewing and becoming familiar with any modifications to this Privacy Policy. Modifications are effective when posted, and your use of our website or any of our services following any such posted modification and notice of same constitutes your acceptance of this Privacy Policy as modified.

## **Contact Us**

If you have questions or concerns regarding this Privacy Policy, please contact us at: as@changecompanies.net.