

Privacy Notice

If you are a resident of one of the following states, please click [here](#) for more information about your specific privacy rights: California, Colorado, Iowa, Nebraska or Tennessee.

ACCESSIBILITY -- if you are having any trouble accessing this Privacy Notice or this Site, please call our toll-free number at 1-800-225-9702.

EG America, LLC, together with its subsidiaries and related brands* (collectively, “we,” “our,” or “us”) collects and processes information about you as described in this Privacy Notice (this “Notice”). In this Notice, we use the term “Personal Information” to refer to information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, household or device. We are committed to protecting the privacy of those with whom we interact. This Notice contains details about how we collect, use, and share Personal Information that we obtain from and about you in relation to your use of any online service, platform, website (each, a “Site”), or application (each, an “App”), commercial emails we send, and any interactive features, widgets, plug-ins, applications, content, downloads and/or other services that we own and control (including those made available through a Site and/or App), in each case that posts a link to this Notice (collectively, the “Service”). Please read this Notice carefully.

* These include Certified Oil, Cumberland Farms, Fastrac, Kwik Shop, Loaf ‘N Jug, Minit Mart, Quik Stop, Tom Thumb, Sprint and Turkey Hill.

1. Applicability

“Consumers” have certain privacy rights under applicable state laws of the United States, including the California Consumer Privacy Act (California Civil Code § 1798.100 et seq.), as amended (including, without limitation, by the California Privacy Rights Act (the “CCPA”), the Colorado Privacy Act (Colorado Revised Statute Title 6 Article 1 Part 13 § 6-1-1301 et seq.), the Iowa Consumer Data Protection Act (Code of Iowa, Ch. 715D), the Nebraska Data Privacy Act (Nebraska Rev. Stat. § 87-1101 et seq.) and the Tennessee Information Protection Act (Tennessee Code Ann., § 47-18-3201 et seq.)(collectively, “U.S. Privacy Laws”). This Notice is designed to meet our obligations under U.S. Privacy Laws.

This Notice does not apply to independent contractors, job applicants or our current or former employees. If you are a job applicant, please see the notice provided [here](#). If you are an independent contractor or current or former employee, please see the employee privacy policy available at privacy@eg-america.com.

2. What Personal Information Do We Collect?

Sources of Information

a. **From You Directly.** We may collect Personal Information from you directly, such as when you use our SmartRewards App (“SmartRewards”), join and participate in our loyalty programs, join our Alloy branded credit card program (“Alloy”), or otherwise communicate with us. We may also collect demographic information that you provide to us, such as your zip code or age. We may collect household information from you, specifically Personal Information that could identify, relate to, describe, or is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular household.

Our App may access and read accounts, data and/or content on your device, add content to your device, and change settings of your device, for the following reasons: (i) allowing you to access and use the Service (or certain of its features and functions); (iii) sending and receiving data needed for App operations; and (iv) in connection with your Service usage. You consent to these activities by installing the App or otherwise using the Service. Your device settings may enable you to disable, change or limit some of these activities and you can disable all of them associated with the App by uninstalling the App or by adjusting your device and/or App settings.

In certain of our stores, we may also collect audio recordings of conversations between our customers and our employees. We use the information we collect for customer support, employee training and other internal business purposes. We do not associate this data with any specific consumers.

b. **Systems and Platforms.** We may use a variety of technologies that store or collect certain information whenever you visit or interact with the Service ("Usage Information" defined below). This Usage Information may be stored or accessed using a variety of technologies that may be downloaded to your personal computer, browser, laptop, tablet, mobile phone or other device whenever you visit or interact with our Site, SmartRewards, Alloy, or our loyalty programs.

c. **Social Media.** Our Site or App may, from time to time, contain links to and from social media platforms. You may choose to connect to us through a social media platform, such as Facebook or Twitter, and when you send us a direct message, we may collect additional information from you, such as your screen names, profile picture, and contact information through the social media platform so that we can respond to your direct inquiry. We may also engage vendors to help us manage our social media accounts and they may receive information about you in performing services for us. Additionally, please be advised that social media platforms may also collect information from you. When you click on a social plug-in, such as Facebook's "Like" button or Twitter's "tweet" button, that particular social network plugin will be activated and your browser will directly connect to that provider's servers. We do not have control over the collection, use and sharing practices of social media platforms and encourage you to review their usage and disclosure policies and practices, including the data security practices, before using the social media platforms.

d. **Data Analytics Providers and Data Brokers.** We receive information about you and your interactions with us from third parties, such as from third party service and content providers, companies that provide or sell lists of consumer contact information, and others interacting with us.

Categories of Personal Information We Collect

The following is a description of the types of information that we collect about you and the length of time that we retain such information:

<u>Category of Information</u>	<u>Description</u>	<u>Retention Period</u>
Identifiers	Your name, alias, postal address, country of residence, unique personal identifier, online identifier, internet protocol address, email address, account name, phone number, social media identifiers, social security number, driver's license number, passport number, or other similar identifiers.	7 years
Financial Information	Your bank account number, credit card number, debit card number, government-issued Tax ID, or any other financial information.	7 years
Protected Information	Information relating to protected classes, such as age, gender, sex, citizenship and date of birth.	7 years
Commercial Information	Records of personal property, creditworthiness, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	7 years
Usage Information	Such as your IP address, UDID, advertising identifier, and device identifier; device functionality (browser, operating system, hardware, mobile	7 years

	network information); the URL that referred you to our Service; the areas within our Service that you visit and your activities there (including emails, such as whether you open them or click on links within); your device location (if you have enabled certain Location-identifying Technologies (defined below)); your device characteristics; and device data and the time of day.	
Geolocation information	Information such as longitude and latitude from your IP address or mobile device when using SmartRewards when you make a purchase using SmartRewards we will collect precise location data, including real-time geographic location.	Promptly Deleted After Retail Transactions
Audio, electronic, visual, thermal, olfactory, or similar information	Information such as CCTV video recordings of our premises, audio recordings when you speak with our Guest Services Department and in certain of our stores, audio recordings of your conversations with our employees.	60 days
Sensitive Personal Information	We also collect the following categories of sensitive information, referred to herein collectively as "Sensitive Personal Information":	
	Social security, driver's license, state identification card, or passport numbers.	7 years
	Account log-in, financial account, debit card, or credit card numbers in combination with any required security or access code, password, or credentials allowing access to an account.	7 years
	Data that is derived from a device and that is used or intended to be used to locate a consumer within a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet.	Promptly Deleted After Retail Transactions

Scope of PI: There may be additional information that we collect that meets the definition of PI under applicable U.S. Privacy Laws but is not reflected by a category above, in which case we will treat it as PI as required, but will not include it when we describe our practices by category of PI.

3. How Do We Use Your Information?

We use your information to enable interactions between you and us for business and commercial purposes, including to provide products and services you request, to perform customer service functions, to prevent security and fraud, for marketing and promotional purposes, and to perform Site and App analytics.

The information that we collect about you may be used in various ways, including to:

a. **To Provide Our Products and Services to You.** We process certain types of personal information when you access or use our Services, including to:

- process, or facilitate requests for, purchases of our products;
- register, administer or verify your loyalty programs such as SmartRewards;
- register, administer or verify your enrollment in Alloy

- administer other rewards or promotional programs;
- support your interactions with us;
- diagnose, repair, and track service and quality issues; facilitate an order, return, or exchange; provide requested information; communicate with you about your loyalty program account, your SmartRewards account, or our data practices; install and configure changes and updates to programs and technologies related to interactions with us; authenticate those who interact with us; or to respond to your requests, complaints, and inquiries.

b. For Our Internal Research, Development and Improvement of Our Products and Services. We make it a priority to ensure that our products and services meet and exceed your expectations, including continually improving and expanding our Site, Apps, products/services. Accordingly, we may process certain personal information, including to:

- evaluate or audit the usage and performance of programs and technologies related to interactions with us and to conduct related employee training;
- design new services; process and catalog your responses to surveys or questionnaires (e.g., customer satisfaction reviews); and
- perform internal research for technological development and demonstration; conduct data analysis and testing.

c. For Legal, Safety, or Security Reasons. It is important to us that we maintain a safe and secure environment for you such as to:

- comply with legal requirements – to comply with applicable laws that may be required to process certain personal information under certain laws and regulations, such as tax or employment laws, as well as to maintain appropriate records for internal administrative purposes, and comply with applicable legal and regulatory obligations and respond to lawful government requests when necessary.
- protect our safety, our property or rights of those who interact with us, or others; and
- enforce our Terms, Agreements or Policies –to maintain a safe and secure environment for you when you use our Sites, Apps, and other services, such as to detect, prevent, and respond to security incidents or other malicious, deceptive, fraudulent, or illegal activity.

d. For any other purposes for which you provide consent.

e. For marketing. We may use your Personal Information to market our products or services or those of third parties, such as our business partners. We do not share your Personal Information that we have collected directly from you on our Service with third parties for those third parties' direct marketing purposes unless we have given you the ability to choose to consent or withhold consent to such sharing. We may also use your Personal Information when you participate in marketing surveys, questionnaires, promotions, events, contests, our loyalty programs, Alloy or SmartRewards. We may audit aspects of our ad impressions. We may use your Personal Information for short-term transient use, including for contextual ad customization. We may use your Personal Information to enhance our content and to potentially send you commercial emails, text messages, and coupons via SmartRewards or our other loyalty programs.

4. To Whom Do We Provide Your Personal Information?

We may disclose your Personal Information with the categories of recipients described below. For more information specific to California, Colorado, Iowa, Nebraska or Tennessee residents, see "Your State Law Privacy Rights," below:

- a. **Affiliates and subsidiaries:** We may share your Personal Information within our group of companies, which includes parents, corporate affiliates, subsidiaries, business units, and other companies that share common ownership.
- b. **Third party service providers:** We may share your Personal Information with third party service providers working on our behalf in order to facilitate our interactions with you or request or support our relationship with you, such as hosting service providers, IT providers, operating systems and platforms, internet service providers, analytics companies (e.g., Google, as further described below), and marketing providers (e.g., Facebook and email marketing providers). We may contract with other companies to provide certain services, including, identity verification, email distribution, market research, promotions management and payment processing. We provide these companies with only the information they need to perform their services and work with them to ensure that your privacy is respected and protected. These companies are prohibited by contract from using this information for their own marketing purposes or from sharing this information with anyone other than with us.
- c. **Business Partners:** We may also provide your Personal Information or provide access to your Personal Information to our business partners to complete requested transactions or in connection with certain promotional offers in which you participate.
- d. **For legal, security and safety purposes:** We may share your Personal Information with third parties such as law enforcement or other government agencies to comply with law or legal requirements; to enforce or apply our Terms of Use and other agreements; and to protect our rights and our property or safety of our users or third parties.
- e. **In connection with a transaction:** If we sell some or all of our assets, merge or are acquired by another entity, including through a sale or in connection with a bankruptcy, we will share your Personal Information with that entity.

We may also de-identify, anonymize, or aggregate Personal Information to share with third parties for any purpose.

5. Children's Privacy

Interactions with us are intended for individuals 16 years of age and older. Our interactions are not directed at, marketed to, nor intended for, children under 16 years of age. We do not knowingly collect any information, including Personal Information, from children under 16 years of age. If you believe that we have inadvertently collected Personal Information from a child under the age of 16, please contact us at the address below and we will use reasonable efforts to delete the child's information from our databases.

6. Cookies, Online Analytics and Links to Third Party Websites

Cookies

We use "cookies", which are small text files that are stored on your computer or equipment when you visit certain online pages, web beacons and similar technologies to record your preferences and actions and track your use of our services. We may also use cookies to monitor traffic, improve our Site and make it easier and/or relevant for your use. We use these technologies to:

- Remind us who you are when you access our services which helps us to provide you with services tailored to your specific needs and interest;
- Determine the browser you are using so our services work properly;
- Assist us with sending you notifications;
- Generate analytics regarding your use of our services; and
- Estimate our audience size by determining whether your visit is your first.

You can set your browser or device to refuse all cookies or to indicate when a cookie is being sent. If you delete your cookies or if you set your browser or device to decline these technologies, some services may not

function properly. Our services do not currently change the way they operate upon detection of a Do Not Track or similar signal, but see “Opt-Out Preference Signals,” below.

Online Analytics

We also use various types of online analytics, including Google Analytics, a web analytics service provided by Google, Inc. (“Google”), on our Services. Google Analytics uses cookies or other tracking technologies to help us analyze how users interact with and use our services, compile reports on the related activities, and provide other services related to Site and app activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a return visitor, and any referring site or app. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google’s privacy policy. To learn more about Google’s partner services and to learn how to opt-out of tracking of analytics by Google, click [here](#).

Our Site may contain links to other sites, including, among others, those of advertisers, other third parties and companies whose trademarks may appear on our Site. We are not responsible for the privacy practices or the content of the sites to which we link.

Tracking Technologies – Your Additional Choices

Browser Settings; In addition, you can exercise control over browser-based cookies by adjusting the settings on your browser, and mobile devices may offer ad and data limitation choices. Please note that when you use cookie control tools, you will have to change your settings for each browser and device you use, and your limitation on cookies can limit the functionality of online services you use, including our services. Use the help function on your browser or click on the applicable links below to learn more:

- [Google Chrome](#)
- [Firefox](#)
- [Internet Explorer](#)
- [Edge](#)
- [Safari](#)

In addition, third party tools may enable you to search for and opt-out of some of these trackers, such as the Ghostery browser plug-in available at <https://www.ghostery.com/>.

Mobile Device Settings: You can use mobile device settings to limit mobile tracking technologies and associated activities. For instance, you can adjust or reset the advertising identifiers on your mobile device in the device settings of iOS and Android devices. iOS users can visit Settings > Privacy > Advertising > Reset Advertising Identifier. Android users can visit Google settings > Ads > Reset advertising ID. These controls work much like deleting cookies in a browser—the device is harder to associate with past activity, but tracking may still occur using the new advertising identifier.

Ad Industry Tool: Some third parties that may collect PI in association with your use of our online services for advertising, analytics and other purposes, and may sell that PI downstream, provide you the opportunity to opt-out of their sales. Please visit <https://www.privacyrights.info/> to opt-out of the sale of PI by participating third parties. You must opt out on every device and browser you use in order to effectuate your “Do Not Sell” requests from these parties. However, opting out does not mean you will stop seeing ads and you may continue to still see interest-based ads. To learn more about interest-based advertising and additional opt-out choices related to it, please visit this website ([here](#) and [here](#))

Clearing cookies or changing settings may affect your choices and you may have to opt-out separately via each browser and other device you use. Cookie-enabled opt-outs signals may no longer be effective if you delete, block or clear cookies. We do not represent and are not responsible for the completeness, accuracy or effectiveness of any third-party notices, tools, or choices.

7. Security

We maintain reasonable security procedures and technical and organizational measures to protect your Personal Information against accidental or unlawful destruction, loss, disclosure, alteration, or use. However, no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially reasonable means to protect your Personal Information, we cannot guarantee absolute security. When you provide us with financial information, we handle your payment card information in accordance with industry standards, such as Payment Card Industry Data Security Standard (PCI DSS). If you have reason to believe that your Personal Information is no longer secure (for example, if you feel that the security of your account has been compromised), please contact us immediately at smartrewards@eg-america.com.

8. Terms of Use

The Terms of Use for interactions with us is incorporated by reference into this Notice and can be found [here](#).

9. Changes to This Notice

We may update this Notice from time to time. Any such updates will be effective when posted. Please check this Notice periodically for updates. If any of the changes are unacceptable to you, you should cease interacting with us. When required under applicable law, we will notify you of any changes to this Notice by posting an update on this Site. When required under applicable law, we will seek affirmative consent from you before making material changes to the way we handle Personal Information previously collected from you. If you do not provide such consent, your Personal Information will continue to be used in a manner that is consistent with the version of this Notice under which it was collected.

10. Contact Us

If you have questions or concerns regarding this Notice or our privacy practices, please contact us at:

PHONE: 1-800-225-9702

MAIL:

EG America, LLC
Attn: Guest Services-Consumer Privacy
165 Flanders Road
Westborough, MA 01581

WEBFORM: click [here](#).

To opt-out of receiving promotional email messages from us, please click on the "Unsubscribe" link contained at the bottom of each email or by contacting us using the information above.

11. Your State Law Privacy Rights

If you are a resident of California, Colorado, Iowa, Nebraska or Tennessee, this section applies to you. If you are a resident of any other state, the rights described in this section do not apply to you.

Summary of Personal Information Collected

Below is a summary of the Personal Information we have collected from consumers in the previous 12 months and the categories of third parties with whom we have disclosed Personal Information for a business purpose. Information about the categories of sources from which we collect Personal Information and the purposes for which we use Personal Information are described above in "What Personal Information Do We Collect?" and "How Do We Use Your Personal Information?", respectively.

<i>Categories of Personal Information We Collect</i>	<i>Categories of Third Parties With Whom We Disclosed Personal Information for a Business Purpose</i>
Identifiers	Business partners to complete requested transactions or in connection with certain promotional offers in which you participate. Service providers, such as IT providers, accountants, logistics providers, analytics companies, and marketing providers.
Protected Characteristics	Service providers, such as IT providers, accountants, logistics providers, analytics companies, and marketing providers.
Financial Information	Service providers, such as IT providers, accountants, logistics providers, analytics companies, and marketing providers.
Usage information	Service providers, such as analytics companies and marketing providers.
Commercial information	Service providers, such as IT providers, accountants, logistics providers, analytics companies, and marketing providers.
Geolocation information	Service providers, such as IT providers, accountants, logistics providers, analytics companies, and marketing providers.
Audio, electronic, visual, thermal, olfactory or similar information	Service providers, such as IT providers, accountants, logistics providers, analytics companies, and marketing providers.

We have sold the following categories of Personal Information in the previous 12 months: identifiers. We sold identifiers consisting of a unique identifier to a business partner in order to allow participating consumers to receive a discount on certain products manufactured by such business partner and sold in our stores. We have also sold and shared de-identified, anonymized, or aggregated data, which does not constitute Personal Information. For California, Colorado, Iowa, Nebraska or Tennessee residents, please see the “Your Rights” section below for information on how to exercise your right to opt out of sales. We do not knowingly sell or share any Personal Information of minors under the age of 16.

As described under “Cookies, Online Analytics and Links to Third Party Websites” section above, cookie operator Third-Party Services (“Cookie Operators”) collect PI that falls under the Identifiers (e.g., cookie ID, IP address, and other online IDs) and Internet Usage Information categories. For California, Colorado, Iowa, Nebraska or Tennessee residents, we only disclose this information if directed by you through the cookie banner that appears on our websites. To the extent we disclose this PI at your direction, the categories of PI would be Identifiers and Internet Usage information, and the recipients of each category of PI would be Cookie Operators.

Sensitive Personal Information

We do not use or disclose Sensitive Personal Information for purposes other than the following:

- a. To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.

- b. To detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted personal information.
- c. To resist malicious, deceptive, fraudulent, or illegal actions directed at us and to prosecute those responsible for those actions.
- d. To ensure the physical safety of natural persons.
- e. For short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of a consumer's current interaction with us.
- f. To perform services on behalf of our business, such as maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of our business.
- g. To verify or maintain the quality or safety of a service or device that we own, manufacture or control, and to improve, upgrade, or enhance a service or device we own, manufactured or control.

Financial Incentive Programs

SmartRewards, Alloy, and EG Rewards and certain promotional programs at the point-of-sale (collectively, the "Rewards Programs") are voluntary programs that provide you with various benefits, including discounts on fuel, access to coupons and other rewards.

In order to provide you with the benefits described above, we use the types of personal information about you described below to identify you as a member of the Rewards Program and provide you with relevant messaging, coupons and offers. These financial incentives are reasonably related to the value of the personal information you provide.

The following are the categories of personal information that we collect from you in connection with your membership in the Rewards Programs:

- Identifiers (e.g., name, mailing address, email address, driver's license number, phone number and banking account number);
- Characteristics of protected classifications (e.g., age);
- Commercial information (e.g., products or services purchased, purchase history);
- Geolocation data (e.g., latitude or longitude); and
- Inferences drawn from any of the above (e.g., preferences or characteristics).

The value to our business of any individual consumer's personal information is dependent on a number of factors, including, for example, whether and to what extent you take advantage of any coupons, discounts or other offers provided under the Rewards Programs.

We also incur a variety of expenses related to the Rewards Programs. We make this investment in order to offer a more personalized and relevant customer experience. Expense associated with the Rewards Programs include, if offered, discounts on fuel, discounts on items purchased in our stores, and access to offers only available to Rewards Program members. The expense associated with the Rewards Program incentives will vary as it is dependent on your engagement with the Rewards Programs, including your total annual spend with us and the frequency and depth of discounts you choose to use.

We do not calculate the value of personal information in our accounting statements. Whether we create overall value from our Rewards Programs that could be directly or reasonably related to the value of personal information would depend on the extent to which the sales generated by the Rewards Programs exceed the above-referenced expenses associated with offering them.

You can choose to opt in and become a SmartRewards member by clicking [here](#) or by downloading the app from either the App Store or the Google Play Store. You can choose to opt in and become an EG Rewards member by speaking to an associate at one of our QuikStop stores.

If you no longer wish to be a member of any of our Rewards Programs, you can withdraw from any program at any time by emailing us at guestservices@cumberlandfarms.com.

If you opt out of any of the Rewards Programs in which you are a member, any accumulated points, fuel rewards, and progress towards free or discounted products associated with such membership will be deleted. If you later re-join the Rewards Program from which you withdrew, any such deleted points or other benefits will not be reinstated.

Information on the terms and conditions of the Rewards Programs can be found [here](#).

Your Rights

Residents of California, Colorado, Iowa, Nebraska or Tennessee have certain rights regarding the collection, use, and sharing of Personal Information. As described more below, subject to meeting the verification requirements under applicable U.S. Privacy Laws, residents of such states may exercise any of the following rights via our webform or by calling 1-800-225-9702.

- **Right to Know.** You have the right to request information about the Personal Information we have collected about you in the previous 12 months:

(1) Categories of Personal Information (Available for California Residents Only)

California residents have a right to submit a request for any of the following for the period that is twelve (12) months prior to the request date:

- The categories of Personal Information we have collected about you.
- The categories of sources from which we collected your Personal Information.
- The business purposes or commercial purposes for our collecting or Selling your PI.
- The categories of third parties to whom we have shared your Personal Information.
- A list of the categories of Personal Information disclosed for a business purpose in the prior 12 months and, for each, the categories of recipients, or that no disclosure occurred.
- A list of the categories of Personal Information sold about you in the prior 12 months and, for each, the categories of recipients, or that no sale occurred.

(2) Specific Personal Information

You may request to confirm if we are processing your Personal Information and, if we are, to obtain a transportable copy, subject to applicable request limits, of your Personal Information that we have collected and are maintaining. We have no obligation to re-identify information or to keep Personal Information longer than we need it or are required to by applicable law to retain it to comply with access requests.

- **Right to Correct.** You have the right to request that we correct inaccurate Personal Information that we maintain about you.
- **Right to Delete.** You have the right to request that we delete Personal Information that we have collected from you.

- **Right to Opt Out of Sale/Sharing.** You have the right to opt-out of the sale of your Personal Information.

You may exercise your right to know twice in any 12-month period, measured from the date we receive your first request. If you submit additional requests, we will either: (i) proceed with honoring your request; or (ii) deny your request in writing.

Verification: In order to exercise your rights, we will need to obtain information to locate you in our records or verify your identity depending on the nature of the request. If you are submitting a request on behalf of a household, we will need to verify each member of the household in the manner set forth below.

- *Requests to Know (Categories and Specific Information).* In connection with a request for the specific Personal Information we hold about you, you must provide your first and last name, your email address, the email address you provided when you enrolled in one of our rewards programs (if applicable), your street address, and your city and state of residence to verify your identity, as well as a signed declaration under penalty of perjury that you are who you say you are. In connection with a request for the categories of Personal Information we hold about you, we will request your first and last name, your email address, the email address you provided when you enrolled in one of our Rewards Programs (if applicable), your street address, and your city and state of residence to verify your identity.
- *Requests to Correct.* For a request to correct Personal Information we hold about you, you must provide the following information, except that if any of the following is information you wish to correct, you need not provide it: your first and last name, your email address, the email address you provided when you enrolled in one of our rewards programs (if applicable), your street address, and your city and state of residence to verify your identity, as well as a signed declaration under penalty of perjury that you are who you say you are.
- *Requests to Delete.* For a Right to Delete request, we will request first and last name, email address, the email address you provided when you enrolled in one of our Rewards Programs (if applicable), street address, and city and state of residence to verify your identity.
- *Requests to Opt-Out.* While we will not verify your identity in connection with your Request to Opt Out of sales, we will still need to obtain certain information to ensure that we are applying your request to the correct information. Therefore, to submit these requests, you must provide name, SmartRewards account number, and email.

Authorized Agents: You may use an authorized agent to exercise your rights on your behalf. If you are making a requests to know, to correct or to delete through an authorized agent, you or the authorized agent must provide written authorization and we will verify the identity of you and the authorized agent as described above. Alternatively, for California residents, we will accept a legal Power of Attorney under the California Probate Code to the authorized agent. To make a request using an authorized agent, use the [webform](#) and upload documentation demonstrating the agent's authority to exercise rights on your behalf.

Opt-Out Preference Signals

Certain U.S. Privacy Laws require businesses to process signals sent by a platform, technology, or mechanism, enabled by individuals on their devices or browsers, that communicate the individual's choice to opt-out of the Sale and Sharing of personal information. These signals are referred to in California as opt-out preference signals ("OOPS"). To implement an OOPS, you can download an internet browser or a plugin to use on your current internet browser and follow the settings to enable the OOPS. As of the Effective Date, the CCPA's regulations, which are supposed to set forth requirements as to OOPS, have not yet been finalized. We will process OOPS as specifically required when the regulations are finalized. In the meantime, to our knowledge, we have configured the settings of our consent management platform to receive and process OOPS on our Site.

Timing: We will process Requests to Delete, Requests to Correct and Requests to Know within 45 calendar days, unless we need more time, in which case we will notify you and may take an additional 45 calendar days (up to 90 calendar days total) to process your request.

Appeals: If you are a Colorado, Iowa, Nebraska or Tennessee resident and wish to appeal our response to your request to exercise your privacy rights, please contact us using any of the methods described in "Contact Us," above. Within 45 days after receipt of an appeal, we will inform you of any action taken in response to the appeal, if any, along with a written explanation of the reasons for such action or inaction. We may extend the 45-day period by 60 additional days where reasonably necessary.

Non-Discrimination

We will not discriminate against you in a manner prohibited by the CCPA because you exercise your CCPA rights. However, we may charge a different price or rate, or offer a different level or quality of good or service, to the extent that doing so is reasonably related to the value of the applicable data. In addition, we may offer you financial incentives for the collection, sale, retention and use of your PI as permitted by the CCPA that can, without limitation, result in reasonably different prices, rates, or quality levels. The material aspects of any financial incentive will be explained and described in its program terms. Please note that participating in incentive programs is entirely optional, you will have to affirmatively opt-in to the program and you can opt-out of each program (i.e., terminate participation and forgo the ongoing incentives) prospectively by following the instructions in the applicable program description and terms. We may add or change incentive programs and/or their terms by posting notice on the program descriptions and terms linked to above so check them regularly.

Limitation of Rights

Notwithstanding anything to the contrary, we may collect, use and disclose your PI as required or permitted by applicable law and this may override your CCPA rights. In addition, we need not honor any of your requests to the extent that doing so would infringe upon our or any other person or party's rights or conflict with applicable law.

Additional California Notices

California's "Shine the Light" law permits California residents to request certain information regarding our disclosure of PI to third parties for their own direct marketing purposes.

Separate from CCPA "Do Not Sell" rights, California residents who provide personal information in obtaining products or services for personal, family, or household use are entitled to request and obtain from us once a calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing use. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year.

To obtain this information, please send an email message to guestservices@cumberlandfarms.com with "Request for California Privacy Information" on the subject line and in the body of your message.

We will provide the requested information to you at your e-mail address in response. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response.

As these rights and your CCPA rights are not the same and exist under different laws, you must exercise your rights under each law separately.

Additional Nevada Notice

Nevada "consumers" have the right to instruct us not to "sell" "covered information" as those terms are defined by Chapter 603A of the Nevada Revised Statutes. Although we do not currently "sell" "covered information" of Nevada "consumers" as those terms are defined under that law, you may contact us [at guestservices@cumberlandfarms.com](mailto:guestservices@cumberlandfarms.com) and provide your name, Nevada resident address, and email address to be verified and exercise your opt-out rights in the event we do sell covered information under that law in the future. If you change your email address or other contact information, contact us in the same manner to update

your contact information to help facilitate your opt-out. Changing your contact information elsewhere (e.g., informational requests, account information, etc.) will not update your Nevada opt-out information and we will only use the information provided to our opt-out program for managing opt-outs. It is your responsibility to keep your opt-out information current. If after opting-out you direct us to share you covered information with others, we will do so regardless of your prior opt-out.

This Notice was last updated on January 1, 2025.