



ARCADIA PRIVACY POLICY

Last Updated: August 25, 2026

Effective Date: August 25, 2026

Scope of this Privacy Policy

Arcadia Power, Inc. and its affiliates (“Arcadia”, “we”, “us”, “our”) that act as a business or controller within the meaning of applicable state privacy laws, with respect to your privacy. This privacy policy describes how we collect, use, disclose, and protect personal information during the course of providing our services. It also tells you about the rights and choices you have with respect to the personal information we maintain about you.

By using our Platforms, Products, and/or Services, you agree to let us collect and use your Personal Information as described in this Policy. Therefore, before you provide us with any Personal Information, you should review this Policy in its entirety and understand its terms. This Policy covers our products, services, platforms, and features. When you read “Services” in this Policy, we’re talking about all of them. Also if you see us refer to our “Terms”, we mean the “Terms of Service” that you agree to when you sign up for our Services.

Please note: all information in this Privacy Policy is applicable to you unless otherwise indicated based on your residency status. For the additional terms which may be applicable to you based on your residency status, please refer to your country-specific terms at the end of this Policy.

This Privacy Policy covers the following topics:

1. What Personal Information We Collect, How We Use it, and To Whom We Disclose
2. How Long Will You Use My Personal Information?
3. If You Do Not Provide Personal Information.
4. How We Protect Your Personal Information
5. International Data Transfers
6. Children's Privacy
7. Links to Other Websites
8. Your Choices Regarding Your Personal Information
9. Questions about this Policy
10. Specific Privacy Rights under US State Laws
11. Supplemental EEA Privacy Notice
12. Changes to this Policy
13. Contact Us

1. What Personal Information We Collect, How We Use it, and To Whom We Disclose

We collect personal information for a wide range of purposes, but the main reason we collect personal information is to offer you the best possible products and services. We make sure we do not collect more information than necessary or collect information for purposes that are different, unrelated, or incompatible with what's detailed in our Privacy Policy. We collect the categories of personal information and sensitive personal information about you as identified in the chart below depending on the products or services you may use, as well as your device and account settings, and depending upon the contractual relationship you have with Arcadia. We may collect this data when you provide it to us, when you use our services, or when we receive it from third parties. Not all categories of personal information will be collected or received about every individual. Please note that personal information does not include publicly available information from government records and de-identified or aggregated consumer information. As further set forth in the chart below, in the past 12 months, unless otherwise stated in an agreement between us, or in accordance with law, we have disclosed and sold your personal information to third parties for business or commercial purposes. These activities may be considered “sales,” “sharing,” or “targeted advertising” under applicable laws.

Personal Information	Types of Personal Information captured by each category	Collected in the last 12 months:	Business or commercial purpose for collecting, selling, sharing, and disclosing personal information:	Sold, shared, or disclosed for a business or commercial purpose to third parties in the preceding 12 months:	Categories of third parties to whom the personal information was sold, shared, or disclosed in the preceding 12 months:
	This may include		Commercial Purposes: • Marketing and Advertising Purposes • Energy Services and Products • Customer Communication • Eligibility for Low-income programs • Developing insights as to consumer interests and behaviors • Keeping contact information up to date and relevant		Third parties at your direction Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Energy and Utility Companies Marketing and Research Companies

Personal identifiers	first and last name, postal address, email address, telephone number, identifiers assigned to you for our internal use, employee ID, telephone number, signature, user name and password and occasionally, when necessary for specific purposes, gender, date of birth, age, place of birth.	Yes	• Enabling relevant and personalized marketing messages • Location services • Analytics • Decisioning • Research and development • Debt recovery • Door-to-door Marketing Data • Marketing and outreach Business Purposes: • Service Delivery • Auditing • Internal research • Quality control • Improving our services • Mergers and Acquisitions • Credit Scoring • Commercial credit reporting • Data Analytics • Legal obligation and regulatory compliance • Advertising and marketing products • Communicate with consumers about our services • To detect and protect against security incidents	Yes. However, No mobile information will be shared with third parties or affiliates for marketing or promotional purposes. All other categories of data, excluding text messaging originator opt-in data and consent, will not be shared with third parties	Regulatory Authorities or Law Enforcement Credit Reporting Agencies Financial Service Entities Contractors Analytics Firms Business to Business Companies Consumer Services Companies Government Agencies Regulatory Authorities or Law Enforcement
Third party service account data	This may include username and password, account number, usage/billing data,	Yes	Commercial Purposes: • Marketing and Advertising Purposes	Yes	Third parties at your direction Service providers and data licensors Affiliates

	payment history, account history, program participation date, utility usage data, and other data related to your account with us or your utility company account.		• Energy Services and Products • Customer Communication • Eligibility for Low-income programs • Developing insights as to consumer interests and behaviors • Keeping contact information up to date and relevant • Enabling relevant and personalized marketing messages • Location services • Analytics • Decisioning • Research and development • Debt recovery • Door-to-door Marketing Data • Marketing and outreach Business Purposes: • Service Delivery • Auditing • Internal research • Quality control • Improving our services • Mergers and Acquisitions • Credit Scoring • Commercial credit reporting • Data Analytics • Legal obligation and regulatory compliance • Advertising and marketing products	Business Partners Business Transferees Advertising and marketing partners Professional advisors Energy and Utility Companies Marketing and Research Companies Regulatory Authorities or Law Enforcement Credit Reporting Agencies Financial Service Entities Contractors Analytics Firms Business to Business Companies Consumer Services Companies Government Agencies Regulatory Authorities or Law Enforcement
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			• Communicate with consumers about our services • To detect and protect against security incidents		
Payment and transactional data	This may include data such as name, transaction amounts, payment methods, refund and return history, subscription details, payment card information, bank account information, billing information, and your purchase history.	Yes	Commercial Purposes: • Marketing and Advertising Purposes • Energy Services and Products • Customer Communication • Eligibility for Low-income programs • Developing insights as to consumer interests and behaviors • Keeping contact information up to date and relevant • Enabling relevant and personalized marketing messages • Location services • Analytics • Decisioning • Research and development • Debt recovery • Door-to-door Marketing Data • Marketing and outreach Business Purposes: • Service Delivery • Auditing • Internal research • Quality control	Yes	Third parties at your direction Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Energy and Utility Companies Marketing and Research Companies Regulatory Authorities or Law Enforcement Credit Reporting Agencies Financial Service Entities Contractors Analytics Firms Business to Business Companies Consumer Services Companies Government Agencies Regulatory Authorities or Law Enforcement

			• Improving our services • Mergers and Acquisitions • Credit Scoring • Commercial credit reporting • Data Analytics • Legal obligation and regulatory compliance • Advertising and marketing products • Communicate with consumers about our services • To detect and protect against security incidents		
Internet or other electronic network activity information:	This may include data related to user activity (e.g., when and how you use the Services and interact with our communications including emails), browsing history, search and clickstream history, online website tracking information, other data related to user activity, and URL referral header information; we may collect this type of information automatically via cookies, pixels, browser web storage, web beacons	Yes	Commercial Purposes: • Marketing and Advertising Purposes • Energy Services and Products • Customer Communication • Eligibility for Low-income programs • Developing insights as to consumer interests and behaviors • Keeping contact information up to date and relevant • Enabling relevant and personalized marketing messages • Location services • Analytics • Decisioning	Yes	Third parties at your direction Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Energy and Utility Companies Marketing and Research Companies Regulatory Authorities or Law Enforcement Credit Reporting Agencies Financial Service Entities Contractors

	and similar technologies		• Research and development • Debt recovery • Door-to-door Marketing Data • Marketing and outreach Business Purposes: • Service Delivery • Auditing • Internal research • Quality control • Improving our services • Mergers and Acquisitions • Credit Scoring • Commercial credit reporting • Data Analytics • Legal obligation and regulatory compliance • Advertising and marketing products • Communicate with consumers about our services • To detect and protect against security incidents		Analytics Firms Business to Business Companies Consumer Services Companies Government Agencies Regulatory Authorities or Law Enforcement
Marketing and research information	• Social media content – blogs, posts and anything posted by an individual online or which mentioned /references an individual • Analytics and profiles of the individuals based on the data	Yes	Commercial Purposes: • Marketing and Advertising Purposes • Energy Services and Products • Customer Communication • Eligibility for Low-income programs	Yes	Third parties at your direction Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners

	collected on them • Voice-enabled services (Speech-to-Text engines for search requests) without being recorded or stored by the mobile device. • Responses you provide when participating in our surveys, promotions, or other marketing campaigns.		• Developing insights as to consumer interests and behaviors • Keeping contact information up to date and relevant • Enabling relevant and personalized marketing messages • Location services • Analytics • Decisioning • Research and development • Debt recovery • Door-to-door Marketing Data • Marketing and outreach Business Purposes: • Service Delivery • Auditing • Internal research • Quality control • Improving our services • Mergers and Acquisitions • Credit Scoring • Commercial credit reporting • Data Analytics • Legal obligation and regulatory compliance • Advertising and marketing products • Communicate with consumers about our services • To detect and protect against security incidents	Professional advisors Energy and Utility Companies Marketing and Research Companies Regulatory Authorities or Law Enforcement Credit Reporting Agencies Financial Service Entities Contractors Analytics Firms Business to Business Companies Consumer Services Companies Government Agencies Regulatory Authorities or Law Enforcement
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Sensitive data and biometric information	We may also collect certain types of sensitive information when permitted by local law or with your consent, or biometric information, for example as when you elect to use fingerprint authentication.	N/A	N/A	N/A	N/A
Audiovisual materials, including transcriptions	Photograph, and images/footage captured/recorded on CCTV or other audio, video and related security/monitoring systems or captured during marketing/public filming events/sessions (including recording of virtual or live workshops or similar events/sessions), voice search functionality to enable a voice command feature that allows you to ask a question and see results (functionality enabled for mobile applications only), and/or audio video recording and transcription during meetings.	Yes	Commercial Purposes: • Marketing and Advertising Purposes • Energy Services and Products • Customer Communication • Eligibility for Low-income programs • Developing insights as to consumer interests and behaviors • Keeping contact information up to date and relevant • Enabling relevant and personalized marketing messages • Location services • Analytics • Decisioning • Research and development • Debt recovery	Yes	Third parties at your direction Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Energy and Utility Companies Marketing and Research Companies Regulatory Authorities or Law Enforcement Credit Reporting Agencies Financial Service Entities Contractors Analytics Firms Business to Business

			• Door-to-door Marketing Data • Marketing and outreach Business Purposes: • Service Delivery • Auditing • Internal research • Quality control • Improving our services • Mergers and Acquisitions • Credit Scoring • Commercial credit reporting • Data Analytics • Legal obligation and regulatory compliance • Advertising and marketing products • Communicate with consumers about our services • To detect and protect against security incidents		Companies Consumer Services Companies Government Agencies Regulatory Authorities or Law Enforcement
Cookies and geolocation data	This may include precise or approximate location determined from your IP address, mobile or other device's GPS, or other information you share with us, depending on your device settings. Please review our Cookies Policy for more details regarding our use of cookies.	Yes	Commercial Purposes: • Marketing and Advertising Purposes • Energy Services and Products • Customer Communication • Eligibility for Low-income programs • Developing insights as to consumer interests and behaviors	Yes	Third parties at your direction Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Energy and Utility Companies

			• Keeping contact information up to date and relevant • Enabling relevant and personalized marketing messages • Location services • Analytics • Decisioning • Research and development • Debt recovery • Door-to-door Marketing Data • Marketing and outreach Business Purposes: • Service Delivery • Auditing • Internal research • Quality control • Improving our services • Mergers and Acquisitions • Credit Scoring • Commercial credit reporting • Data Analytics • Legal obligation and regulatory compliance • Advertising and marketing products • Communicate with consumers about our services • To detect and protect against security incidents		Marketing and Research Companies Regulatory Authorities or Law Enforcement Credit Reporting Agencies Financial Service Entities Contractors Analytics Firms Business to Business Companies Consumer Services Companies Government Agencies Regulatory Authorities or Law Enforcement
Energy Usage	This may include energy usage and		Commercial Purposes:		Third parties at your direction

and Energy Efficiency Information	information about your participation in our renewable energy, energy efficiency, or energy conservation programs, personal property, products or services obtained or considered, or other information related to your utility account history.	• Marketing and Advertising Purposes • Energy Services and Products • Customer Communication • Eligibility for Low-income programs • Developing insights as to consumer interests and behaviors • Keeping contact information up to date and relevant • Enabling relevant and personalized marketing messages • Location services • Analytics • Decisioning • Research and development • Debt recovery • Door-to-door Marketing Data • Marketing and outreach Business Purposes: • Service Delivery • Auditing • Internal research • Quality control • Improving our services • Mergers and Acquisitions • Credit Scoring • Commercial credit reporting • Data Analytics • Legal obligation and regulatory compliance	Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Energy and Utility Companies Marketing and Research Companies Regulatory Authorities or Law Enforcement Credit Reporting Agencies Financial Service Entities Contractors Analytics Firms Business to Business Companies Consumer Services Companies Government Agencies Regulatory Authorities or Law Enforcement
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			• Advertising and marketing products • Communicate with consumers about our services • To detect and protect against security incidents		
Third-Party Widgets	This may include the use of third-party widgets (e.g., social share buttons) on our sites and those of our service providers that enable users to easily share information on other platforms, such as social media.		Commercial Purposes: • Marketing and Advertising Purposes • Energy Services and Products • Customer Communication • Eligibility for Low-income programs • Developing insights as to consumer interests and behaviors • Keeping contact information up to date and relevant • Enabling relevant and personalized marketing messages • Location services • Analytics • Decisioning • Research and development • Debt recovery • Door-to-door Marketing Data • Marketing and outreach Business Purposes: • Service Delivery • Auditing		Third parties at your direction Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Energy and Utility Companies Marketing and Research Companies Regulatory Authorities or Law Enforcement Credit Reporting Agencies Financial Service Entities Contractors Analytics Firms Business to Business Companies Consumer Services Companies Government Agencies Regulatory Authorities or Law

			• Internal research • Quality control • Improving our services • Mergers and Acquisitions • Credit Scoring • Commercial credit reporting • Data Analytics • Legal obligation and regulatory compliance • Advertising and marketing products • Communicate with consumers about our services • To detect and protect against security incidents		Enforcement
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In addition, if you are a candidate who applied for a job opening at Arcadia or is an Employee at Arcadia, we may for recruitment/employment purposes, process the personal information set in the below:

Position and professional or employment -related information.	Professional or employment-related information, such as description of current position, job title, employer, location, and Arcadia contact(s).	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development Business Purposes: • Auditing • Internal research • Quality control • Improving our services • Legal compliance	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Contractors Marketing and Research Companies
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			• To detect and protect against security incidents • Analytics Providers • Social Publishers		Regulatory Authorities or Law Enforcement Business Services/Agency
Additional personal details, contact details and identifiers /demographics	In addition to the personal details listed above, Arcadia may collect additional personal details for recruitment/employment purposes, such as national identification number, social security number, insurance information, marital/civil partnership status, domestic partners, dependents, emergency contact information, and military history; professional/personal calendar availability/scheduling information for meeting/communication purposes.	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development Business Purposes: • Auditing • Internal research • Quality control • Improving our services • Legal compliance • To detect and protect against security incidents • Analytics Providers • Social Publishers	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Contractors Marketing and Research Companies Regulatory Authorities or Law Enforcement Business Services/Agency
Education information and professional or employment-related information.	Arcadia may collect information about your education and professional or employment-related information, such as your employment history.	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing

			Business Purposes: • Auditing • Internal research • Quality control • Improving our services • Legal compliance • To detect and protect against security incidents • Analytics Providers • Social Publishers		partners Professional advisors Contractors Marketing and Research Companies Regulatory Authorities or Law Enforcement Business Services/Agency
Sensitive data for recruitment purposes or for providing assessment /HR consultancy services.	Arcadia may collect certain types of sensitive information when permitted by local law or with your consent, such as health/medical information (including disability status), trade union membership information, religion, race or ethnicity, minority flag, and information on criminal convictions and offences. Arcadia collects this information for specific purposes, such as health/medical information in order to accommodate a disability or illness (subject to legal limits on the timing of collection of such information and other applicable limitations) and to provide benefits; background checks and diversity-related personal information	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development Business Purposes: • Auditing • Internal research • Quality control • Improving our services • Legal compliance • To detect and protect against security incidents • Analytics Providers • Social Publishers	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Contractors Marketing and Research Companies Regulatory Authorities or Law Enforcement Business Services/Agency

	(such as race or ethnicity) in order to comply with legal obligations and internal policies relating to diversity and anti-discrimination.				
Documentation required under immigration laws	Arcadia may may collect data on citizenship, passport data, and details of residency or work permit (a physical copy and/or an electronic copy)	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development Business Purposes: • Auditing • Internal research • Quality control • Improving our services • Legal compliance • To detect and protect against security incidents • Analytics Providers • Social Publishers	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Contractors Marketing and Research Companies Regulatory Authorities or Law Enforcement Business Services/Agency
Financial information for payroll/benefits purposes	Your banking and other relevant financial details we need for payroll/benefits purposes.	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates Business Partners Business Transferees

			Business Purposes: • Auditing • Internal research • Quality control • Improving our services • Legal compliance • To detect and protect against security incidents • Analytics Providers • Social Publishers		Advertising and marketing partners Professional advisors Contractors Marketing and Research Companies Regulatory Authorities or Law Enforcement Business Services/Agency
Talent management information	Information necessary to complete a background check, details on performance decisions and outcomes, performance feedback and warnings, e-learning/training programs, performance and development reviews (including information you provide when asking for/providing feedback, creating priorities, updating your input in relevant tools), driver's license and car ownership information, and information used to populate biographies.	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development Business Purposes: • Auditing • Internal research • Quality control • Improving our services • Legal compliance • To detect and protect against security incidents • Analytics Providers • Social Publishers	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Contractors Marketing and Research Companies Regulatory Authorities or Law Enforcement Business Services/Agency
Requested recruitment	Information requested to provide during the	Yes	Commercial Purposes:	Yes	Third parties at your direction

information	recruitment process, to the extent allowed by applicable law.		• Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development Business Purposes: • Auditing • Internal research • Quality control • Improving our services • Legal compliance • To detect and protect against security incidents Providers • Social Publishers		Service providers Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Contractors Marketing and Research Companies Regulatory Authorities or Law Enforcement Business Services/Agency
Recruitment information you submit	Information that you submit in résumés / CVs, letters, writing samples, or other written materials (including photographs).	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development Business Purposes: • Auditing • Internal research • Quality control • Improving our services • Legal compliance • To detect and protect against security incidents	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Contractors Marketing and Research Companies Regulatory Authorities or Law Enforcement

			• Analytics Providers • Social Publishers		Business Services/Agency
Information generated by us during recruitment or during assessments	Information generated by interviewers and recruiters related to you, based on their interactions with you or basic Internet searches where allowed under applicable law.	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development Business Purposes: • Auditing • Internal research • Quality control • Improving our services • Legal compliance • To detect and protect against security incidents • Analytics Providers • Social Publishers	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Contractors Marketing and Research Companies Regulatory Authorities or Law Enforcement Business Services/Agency
Recruitment information received from third parties	Information related to you provided by third-party placement firms, recruiters, or job-search websites, clients where applicable.	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development Business Purposes: • Auditing	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors

			• Internal research • Quality control • Improving our services • Legal compliance • To detect and protect against security incidents • Analytics Providers • Social Publishers		Contractors Marketing and Research Companies Regulatory Authorities or Law Enforcement Business Services/Agency
Audiovisual information processed during recruitment	Photograph, and images/audio/footage captured on CCTV or other video systems when visiting our office or captured in the course of recruitment events or video recruitment interviews.	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development Business Purposes: • Auditing • Internal research • Quality control • Improving our services • Legal compliance • To detect and protect against security incidents • Analytics Providers • Social Publishers	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Contractors Marketing and Research Companies Regulatory Authorities or Law Enforcement Business Services/Agency
Recommendations	Recommendations related information provided on your behalf by others.	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates

			• Analytics • Decisioning • Research and development Business Purposes: • Auditing • Internal research • Quality control • Improving our services • Legal compliance • To detect and protect against security incidents • Analytics Providers • Social Publishers		Business Partners Business Transferees Advertising and marketing partners Professional advisors Contractors Marketing and Research Companies Regulatory Authorities or Law Enforcement Business Services/Agency
Employment history and background checks	Information about your prior employment, education, and where applicable and allowed by applicable law, credit history, criminal records or other information revealed during background screenings.	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development Business Purposes: • Auditing • Internal research • Quality control • Improving our services • Legal compliance • To detect and protect against security incidents • Analytics Providers • Social Publishers	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Contractors Marketing and Research Companies Regulatory Authorities or Law Enforcement Business Services/Agency

Diversity related information	Information about race, ethnicity, religion, disability, gender (legal and identity) and/or sexual orientation, for purposes of government reporting where required by law, as well as to understand the diversity characteristics of the candidate pool and workforce, subject to legal limits and consent where applicable	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development Business Purposes: • Auditing • Internal research • Quality control • Improving our services • Legal compliance • To detect and protect against security incidents • Analytics Providers • Social Publishers	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Contractors Marketing and Research Companies Regulatory Authorities or Law Enforcement Business Services/Agency
Assessment information	Information generated by your participation in psychological, technical or behavioral assessments. You will receive more information about the nature of such assessments before your participation in any of them.	Yes	Commercial Purposes: • Keeping contact information up to date and relevant • Location services • Analytics • Decisioning • Research and development Business Purposes: • Auditing • Internal research • Quality control	Yes	Third parties at your direction Service providers Service providers and data licensors Affiliates Business Partners Business Transferees Advertising and marketing partners Professional advisors Contractors Marketing and Research

			• Improving our services • Legal compliance • To detect and protect against security incidents • Analytics Providers • Social Publishers	Companies Regulatory Authorities or Law Enforcement Business Services/Agency
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In the event any personal information is disclosed, it would be disclosed to our service provider[s] acting on our behalf and as per the terms of this privacy policy and relevant applicable laws. Service providers cannot use your personal information for their own purposes.

2. How Long Will You Use My Personal Information?

We will retain your personal data only for as long as necessary or as required by applicable laws. We maintain specific records management and retention policies and procedures so that personal data are deleted after a reasonable time according to the following retention criteria:

- We retain your data as long as we have an ongoing relationship with you (in particular, if you have an account with us).
- We will only keep the data while your account is active or for as long as needed to provide services to you.
- We retain your data for as long as needed in order to comply with our global legal and contractual obligations.
- We will retain your data if we need it for other legitimate purposes, such as to prevent harm, investigate possible violations of our Terms of Service or other policies, investigate reports of abuse, or protect ourselves or others.

Although our systems are designed to delete some of your information automatically, we cannot promise that deletion will take place by a specific time. In some cases, we need to comply with legal requirements to store your data which stops us from deleting your information. Other reasons we may be required to keep a copy of your data are if we get reports of abuse or other Terms or policy violations. Finally, we may also keep certain information in backup for a limited period of time or as required by law.

3. If You Do Not Provide Personal Information.

Where we need to collect Personal Information by law, or under the terms of a contract we have with you or relating to your property or residence, and the data is not provided when requested, we may not be able to perform the contract we have or are trying to enter into. In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at that time. You can withdraw your consent at any time by contacting us as identified in the "Contact Us" section of this Policy. You may also opt out of continuing to receive communications from Arcadia related to products and services of Arcadia or third parties other than those that you have inquired

about or are receiving. We may, however, collect, use, or disclose Personal Information without your knowledge or consent in exceptional circumstances where such collection, use, or disclosure is permitted or required by law.

4. How We Protect Your Personal Information

We take reasonable technical, administrative, and physical safeguards to protect the security of your Personal Information. Despite these measures, no system is impenetrable. We cannot guarantee the security of electronic data nor can we guarantee that the information, including Personal Information, you supply will not be intercepted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Platforms, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of or you believe are reasonable. We ask you not to share a password with anyone. Any unauthorized access to or use of our Platforms or information collected and maintained by our Platforms should be immediately brought to our attention by contacting us using the method described in the "Contact Us" section below.

5. International Data Transfers

By using our Platforms, products, and/or Services, or otherwise providing information to us, you understand that information, including Personal Information, from or about you or your use of our products or Services may be transferred to and/or stored in countries outside of your country of residence, including the United States. We may transfer your Personal Information to the United States and other countries where Arcadia conducts business or where our service providers may lie which may not have the same data protection laws as the country in which you initially provided the information, but we will protect your Personal Information in accordance with this Privacy Policy, or as otherwise disclosed to you. We will also comply with applicable legal requirements when transferring Personal Information to countries other than the country where you are located. If you are located in the European Economic Area (EEA), please refer to the Supplemental EEA Privacy Notice at the end of this Policy.

6. Children's Privacy

Our Platforms, Products, and/or Services are designed and intended for adults. By accessing and/or using our Platforms, Products, and/or Services, you represent that you are at least eighteen (18) years old. If we obtain actual knowledge that a user is not at least eighteen (18) years of age, we will promptly delete information associated with that user.

In all events, our Platforms, Products, and/or Services are not intended for, and we do not knowingly collect information from or otherwise market our website or other materials to children under thirteen (13) years of age. If you are a parent or guardian of a child under the age of thirteen (13) and believe that he or she has disclosed Personal Information to us, please contact us as described in the "Contact Us" section below. You may review and request the deletion of your child's Personal Information or prohibit the further use of such information.

7. Links to Other Websites

As part of Platforms, Products, and/or Services, we may provide links to other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through our Sites, Platforms, Products and/or Services. Therefore, this Privacy Policy does not apply to your use of a third-party website accessed by

selecting a link on our Sites or via our Services. To the extent that you access or use the Services through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage you to read the privacy policy of other websites before proceeding to use them.

8. Your Choices Regarding Your Personal Information

- **Disabling Cookies and Managing the Collection of Your Information for Analytics and Advertising Purposes:** You can disable cookies associated with the Digital Platforms by visiting our Cookie Settings on our website. Please note that you will need to do this from each device you use to visit or access our Platforms.
- **Commercial E-mails, Calls, and Text:** You may opt-out of receiving commercial, e.g., telemarketing or informational, e-mails, telephone calls, and/or text messages from us. You may unsubscribe at any time. Please note that even if you unsubscribe from these commercial communications, we may still send you non-commercial (transactional) e-mails, including customer satisfaction surveys, and where authorized, text messages, related to your account, and your transactions via the Services.
- **Do Not Track and Global Privacy Controls:** Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to "Do Not Track" or similar signals. California law requires us to let you know how we respond to web browser DNT signals. Because there currently is not an industry or legal standard for recognizing or honoring DNT signals, we do not respond to them at this time.
- **Mobile Apps:** You can control whether our Apps send you push notifications by changing your notification settings on your mobile device.

Automated Decision Making: We do not use automated decision-making, that results in automated decisions being taken (including profiling) that legally affect you or similarly significantly affect you. Automated decisions are decisions made automatically based on computer determinations (using software algorithms), without human review.

9. Questions about this Policy

If you have any questions or concerns, you may contact us as described in the "Contact Us" section below.

10. Specific Privacy Rights under US State Laws

- **California Privacy Rights**

California residents should refer to our California Privacy Notice attached to this policy for more information about our privacy practices and their California privacy rights.

- **Colorado Privacy Rights**

Colorado residents should refer to our Colorado Privacy Notice attached to this policy for more information about privacy practices and their Colorado privacy rights.

- Connecticut Privacy Rights

Connecticut residents can exercise the following rights by contacting us as described in the “Contact Us” section below:

- Request to Access My Personal Information
- Delete My Personal Information
- Correct My Personal Information
- Opt-Out of the Processing of My Personal Information for Purposes of Targeted Advertising
- Opt-Out of the Sale of My Personal Information: Arcadia does not sell your personal information, so we do not offer an opt out. We may “share” personal information with third parties for marketing purposes. You may indicate your choice to opt-out of the sharing of your personal data with third parties for personalized advertising on third party sites by visiting our opt-out form.
- Utah Privacy Rights

Utah residents should refer to our Utah Privacy Notice attached to this policy for more information about privacy practices and their Utah privacy rights.

- Virginia Privacy Rights

Virginia residents can exercise the following rights by contacting us as described in the “Contact Us” section below:

- Request to Access My Personal Information
- Delete My Personal Information
- Correct My Personal Information
- Opt Out of the Processing of My Personal Information for Purposes of Targeted Advertising
- Opt Out of the Sale of My Personal Information: Arcadia does not sell your personal information, so we do not offer an opt-out. We may “share” personal information with third parties for marketing purposes. You may indicate your choice to opt-out of the sharing of your personal data with third parties for personalized advertising on third-party sites by visiting our opt-out form.

11. Supplemental EEA Privacy Notice

This Notice provides additional information for users in the EEA. Users in the EEA have certain privacy rights as specified under the General Data Protection Regulations (GDPR). Our Privacy Policy is in line with these laws—this notice makes sure we cover the EEA-specific requirements.

By providing this Notice to you, we comply with our information obligations under GDPR. Please note that this Notice shall not confer upon you any rights or obligations that are not conferred upon you by law.

This Notice must be read in conjunction with our Privacy Policy to understand all of the terms that apply to the processing of your personal data. Any capitalized term used in this EEA Notice, but not defined will have the meaning ascribed to it in the applicable privacy act or our Privacy Policy.

Legal Bases for Processing Information of EEA Users

For more information about how we collect, use, and disclose your personal data, please see Our Privacy Policy. If you are from a region that requires a legal basis for processing personal data (such as the EEA), our legal basis for collecting and using the personal data described above will depend on the personal data concerned, the services you use, how you use our Services, and the specific context in which we collect it.

This means we collect and use your information only where:

- We need the personal data to perform a contract with you,
- We need it to provide you the Services, including to operate the Services, provide customer support and personalized features, and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation, and in some cases, we may also have a legal obligation to collect personal data from you or may otherwise need the personal data to protect your vital interests or those of another person, such as in the case where we request personal data from you in the context of a government audit or in response to a request from law enforcement.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services. If you have questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us using the contact information provided below.

Transferring EEA Data Subject information outside the EU/EEA for GDPR

We may transfer the personal data we collect about you to one of more countries outside the EU/EEA, including India, Chile, and the Philippines, in order to perform one of the activities listed above (see "How we will use information about you"). Where there isn't an adequacy decision by the European Commission in respect of those countries - meaning that these are not deemed to provide an adequate level of protection for your personal data - we have put in place the appropriate measures to ensure that your personal data will be secure. These measures include Data Transfer Agreements based on the European Commission's Standard Contractual Clauses. If you require further information about these protective measures, you can request it by contacting us in any of the ways listed in the "Contact Us" section provided below.

Automated Decisions Making

We generally do not use your Personal Data with any automated decision-making processes.

Rights under GDPR

If the processing of your personal data is subject to the General Data Protection Regulation ("GDPR"), you are entitled to certain rights. You have the right to request access to your personal data, to have your personal data corrected, restricted or deleted, to withdraw any consent that you have given to the processing of your personal data (without affecting the lawfulness of the processing prior to your withdrawal of consent) and to object to our processing of your personal data. You also have the right of data portability in certain circumstances, which means that you can request that we provide you (or a third party you designate) with a transferable copy of personal information that you have provided to us. Your rights may be subject to various limitations under the GDPR. If you wish to exercise any of these rights, or if you have any concerns about our processing of your personal data, please contact us in any of the ways listed in the "Contact Us" section provided below. You also have the right to file a complaint with the data protection authority in the EEA.

What we may need from you

If you exercise one of the above rights, we may need to request specific information from you to help us confirm your identity and that you are entitled to make such a request. This is to ensure that personal data is not disclosed to any person who has no right to receive it.

Data Protection Supervisory Authority under GDPR

If you're not satisfied of how we process your personal data and the processing of your personal data is subject to the EU GDPR, you can lodge a complaint by contacting us in any of the ways listed in the "Contact Us" section provided below. You also have the right to file a complaint with the data protection authority in the EEA.

Data Protection Officer

We have appointed Data Protection Officers (DPOs) to oversee compliance of Arcadia with applicable data protection laws and with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact us in any of the ways listed in the "Contact Us" section provided below.

12. Changes to this Policy

We may change this Policy from time to time. Please review the "Last Updated" legend at the top of this page to see when this Policy was last revised and an effective date. Any changes to this Policy will become effective when we post the revised Policy, unless otherwise specifically noted in the legend. When required under applicable law, we will notify you of any changes to this Notice by posting an update on our Site or in another appropriate manner. If you have any concerns about this Policy, please contact Arcadia via the contact information provided in the "Contact Us" section below.

13. Contact Us

We have established processes by which you or an authorized agent can submit requests regarding your personal information. To exercise your options as described in this Privacy Policy, or if you have privacy questions or concerns, you may contact us in one of the following ways:

- by telephone at +866-526-0083; or
- by emailing us at: privacy@arcadia.com.

Collectively, these are referred to as the "Communication Methods." To effectively exercise your privacy options or inquire about how we handle your personal information, you must use one of these Communication Methods. Accordingly, we may take reasonable measures to verify the identity of the person submitting the request.

Utah Privacy Notice

Utah law provides Utah residents with the rights listed below.

Right to Access: You have the right to know and see what personal data we have collected about you in a usable format.

Right to Delete: You have the right to request that we delete the personal data we have collected about you, subject to applicable legal exceptions.

Right to Opt Out of Targeted Advertising and Sale of Personal Data: You have the right to "opt out" of "targeted advertising" and the "sale" of your "personal data" (as defined under Utah law). Arcadia does not sell your personal information, so we do not offer an opt out. We may "share" personal information with third parties for marketing purposes. You may indicate your choice to opt-out of the sharing of your personal data with third parties for personalized advertising on third party sites by visiting our opt-out form.

Certain data may not be provided or may be retained according to the Privacy Statement, for example, to comply with applicable laws. As noted above, we do not sell personal information, and do not use or disclose your sensitive data for purposes other than those listed above, without your consent, or as permitted or required under applicable laws. Therefore, we do not offer consumers a way to opt-out of the sale of their personal information or limit the use of their sensitive data.

EXERCISING YOUR UTAH PRIVACY RIGHTS

We have established processes by which you or an authorized agent can submit requests regarding your personal information. To exercise the rights as described in this Privacy Notice, please submit a request through one of the following ways:

- by telephone at +866-526-0083; or
- by emailing us at: privacy@arcadia.com.

We may take reasonable measures to verify the identity of the person submitting the request.

Colorado Privacy Notice

Colorado law provides Colorado residents with the rights listed below.

Right to Access: You have the right to know and see what personal data we have collected about you in a usable format.

Right to Delete: You have the right to request that we delete the personal data we have collected about you, subject to applicable legal exceptions.

Right to Correct: You have the right to request that we correct inaccurate personal data.

Right to Opt Out of Targeted Advertising and Sale of Personal Data: You have the right to “opt out” of “targeted advertising” and the “sale” of your “personal data” (as defined under Colorado law). Arcadia does not sell your personal information, so we do not offer an opt out. We may “share” personal information with third parties for marketing purposes. You may indicate your choice to opt-out of the sharing of your personal data with third parties for personalized advertising on third party sites by visiting our opt-out form.

Certain data may not be provided or may be retained according to the Privacy Statement, for example, to comply with applicable laws. As noted above, we do not sell personal information, and do not use or disclose your sensitive data for purposes other than those listed above, without your consent, or as permitted or required under applicable laws. Therefore, we do not offer consumers a way to opt-out of the sale of their personal information or limit the use of their sensitive data.

EXERCISING YOUR COLORADO PRIVACY RIGHTS

We have established processes by which you or an authorized agent can submit requests regarding your personal information. To exercise the rights as described in this Privacy Notice, please submit a request through one of the following ways:

- by telephone at +866-526-0083; or
- by emailing us at: privacy@arcadia.com.

We may take reasonable measures to verify the identity of the person submitting the request.

California Privacy Notice

The California Consumer Privacy Act of 2018 (“CCPA”) became effective on January 1, 2020, and created a variety of privacy rights for California consumers. Since that time California has amended the CCPA, and additional states have passed laws extending similar privacy rights to their consumers. We use this notice to make disclosures required by these state laws, in addition to information we provide in our Privacy Policy.

Categories of Personal Information Collected:

We may collect or receive (and may have collected or received during the 12-month period prior to the Last Updated date of this California Notice) the categories of personal information listed below. Not all categories will be collected or received for every individual.

- **Identifiers:** Personal identifiers, such as name, telephone number, physical address, email address, national identification numbers, driver’s license numbers, and signatures
- **Device Information and Online Activity:** Device and online identifiers, keystroke patterns indicative of human or bot website/app usage, mobile and web network activity and related information (such as Mac address, IP address, cookie IDs, browser activity, and other information associated with your browsing history), and social media information
- **Commercial Information:** Purchase and transaction history information (such as products or services you have purchased, rented, or returned), health- and safety-related information, product testimonials, travel and vacation information, and competition entries

- **Communications:** Communication details (such as the content of emails, text messages, or other communications), call logs, and calendar information where Arcadia is a party to the exchange
- **Demographic Information:** Demographic information, such as age (including information about children under the age of 13 with respect to certain purchases and services (e.g., tobacco purchases), gender, citizenship, ethnicity, date of birth, family or marital status, household income, education, professional and employment information, family health, number of children, number of cars owned, and software or virtual assets owned
- **Financial Information:** Financial information, such as credit or debit card numbers, financial account numbers, and claims information
- **Biometric Information:** Biometric information, such as voice prints, imagery of the iris or retina, face geometry, and palm prints or fingerprints
- **Geolocation:** Location information, such as geolocation information
- **Sensory Information:** Audio, visual information, and other sensory information such as photographs and audio and video recordings
- **Background Information:** Background and criminal information, such as background checks and criminal convictions
- **Inferences:** Individual preferences and characteristics, inferences related to shopping patterns and behaviors, intelligence, and aptitudes
- **Sensitive Personal Information:** Government-issued identifiers (such as social security, driver's license, state identification card, or passport number), account log-in and financial information (such as payment card details), and precise geolocation

We collect this information so that we can best serve you, including to fulfill your requests and to share offers or information that we think you may be interested in. As further described in our Privacy Policy, we generally collect and use the above-listed categories of personal information to provide and manage our sites, applications, products, and services, and for other business or commercial purposes, such as advertising, marketing, and to improve our products and services.

Certain data collection on our sites and applications by third parties for purposes of interest-based advertising and social media tools may be a "sale" or "sharing" under California privacy law. As defined by California law, we "sold" or "shared" certain data elements within the following categories of personal information: identifiers, demographic information, commercial information, Internet or other electronic network activity information, approximate geolocation, and inferences drawn from the above.

If you would like to opt out of the sale or sharing of your personal information, you may click the ["Do Not Sell or Share My Personal Information"](#) link in our website footers. Please note that your opt-out choice is specific to the digital property and to the device and browser you are using. You may additionally choose to provide the information requested in this opt-out form, which may enable us to take action on your opt-out request more broadly than for a specific digital property. Arcadia does not sell your personal information, so we do not offer an opt-out for sale. For more information, please see the "Right to Opt-Out of Sale or Sharing of Personal Information" section below.

We retain each category of personal information that we collect for as long as necessary to fulfill the purposes described in our Privacy Policy, including to satisfy legal or reporting requirements. What this means in practice will vary for different types of information, but the criteria assessed in the data retention analysis take into account ongoing business or legal needs for the information, for example in relation to tax, health and safety, and potential or actual disputes or investigations.

More information, including a description of your legal rights, can be found in the “Your California Privacy Rights” section below.

ADDITIONAL PRIVACY MANDATORY DISCLOSURES

We also make the following disclosures for purposes of compliance with California privacy law:

We collected the following categories of personal information in the last 12 months: identifiers, characteristics of protected classifications and demographic information, commercial information, Internet or other electronic network activity information, geolocation data, audio, electronic, visual or similar information, and inferences drawn from the above.

- The sources of personal information from whom we collected are: directly from you, third-party sites or platforms that you link with your registration account, analytics tools, social networks, advertising networks, and third-party services that update or supplement information we hold about you.
- The business or commercial purposes of collecting personal information are as summarized in this Notice, and as described in more detail in our Privacy Policy Table within our Privacy Policy.
- We disclosed certain data elements within the following categories of personal information for a business purpose in the last 12 months: identifiers, characteristics of protected classifications and demographic information, commercial information, Internet or other electronic network activity information, geolocation data, audio, electronic, visual or similar information, and inferences drawn from the above. We disclosed each category to business partners, service providers, government entities, and other third parties as described in the Privacy Policy Table within our Privacy Policy.
- As defined by applicable law, we “sold” or “shared” certain data elements within the following categories of personal information in the last 12 months: identifiers, demographic information, commercial information, Internet or other electronic network activity information, approximate geolocation, and inferences drawn from the above. We “sold” or “shared” each category to or with entities who provide advertising, marketing, or audience measurement; other online third-party branded tools or functionality (such as maps or video players); and social networks.
- The business or commercial purposes of “selling” or “sharing” personal information is to assist us with advertising, marketing, audience measurement, and other functionality on our digital properties.
- We do not “sell” or “share” the personal information of known minors under 16 years of age.
- We do not use or disclose sensitive personal information for purposes other than those specified in Section 7027(m) of the CCPA regulations.

YOUR CALIFORNIA PRIVACY RIGHTS

Right to Know: You have the right to request that we disclose to you the categories of personal information we have collected about you, as well as the sources of such personal information, the purposes, and the categories of third parties with whom such personal information is shared.

Right to Access: You have the right to request, up to two times each year, access to categories and specific pieces of personal information about you that we collect, use, disclose, sell, and share.

Right to Delete: You have the right to request that we delete personal information that we collect from you, subject to applicable legal exceptions.

Right to Correct: You have the right to request that we correct inaccurate personal information that we maintain about you, subject to applicable legal exceptions.

Right to Opt-Out of Sale or Sharing of Personal Information: You have the right to “opt out” of the “sale” or “sharing” of your “personal information” to or with “third parties” (as those terms are defined by applicable law). Arcadia does not sell your personal information, so we do not offer an opt-out. We may “share” personal information with third parties for marketing purposes. You may indicate your choice to opt out of the sharing of your personal data with third parties for personalized advertising on third-party sites by visiting our opt-out form.

Right Not to Receive Discriminatory Treatment: You have the right not to receive discriminatory treatment for the exercise of your privacy rights. If you choose to exercise any of these rights, you will not receive different prices or quality of services unless permitted by applicable law, including if those differences are reasonably related to your information.

Certain data may not be provided or may be retained according to the Privacy Policy, for example, to comply with applicable laws. As noted above, we do not sell personal information, and do not use or disclose your sensitive data for purposes other than those listed above, without your consent, or as permitted or required under applicable laws. Therefore, we do not offer consumers a way to opt out of the sale of their personal information or limit the use of their sensitive data.

EXERCISING YOUR CALIFORNIA PRIVACY RIGHTS

We have established processes by which you or an authorized agent can submit requests regarding your personal information. To exercise the rights as described in this Privacy Notice, please submit a request through one of the following ways:

by telephone at +866-526-0083; or

by emailing us at: privacy@arcadia.com.

We may take reasonable measures to verify the identity of the person submitting the request.

