GDPR Privacy

Legal Basis for Processing Personal Data under GDPR

We may process Personal Data under the following conditions:

- **Consent:** You have given Your consent for processing Personal Data for one or more specific purposes.
- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement with you or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- **Vital interests:** Processing Personal Data is necessary to protect your vital interests or that of another natural person.
- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or the exercise of official authority vested in the Company.
- **Legitimate interests:** Processing Personal Data is necessary for legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular, whether the provision of Personal Data is a statutory or contractual requirement or a condition necessary to enter into a contract.

Your Rights under the GDPR

The Company undertakes to respect the confidentiality of your Personal Data and to guarantee your ability to exercise your rights.

You have the right under this Privacy Policy, and by law, if you are within the EU, to:

- Request access to your Personal Data. The right to access, update or delete the information we obtain about you. Whenever made possible, you can access, update, or request the deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact webadmin@mrsppe.com with ACCOUNT SETTING ASSISTANCE in the Subject Line, which also enables you to receive a copy of the Personal Data we hold about you.
- Request correction of the Personal Data that we hold about you. You have the right to have any incomplete or inaccurate information we hold about you corrected.
- Object to processing your Personal Data. This right exists where we are relying on legitimate interest as the legal basis for our processing, and there is something about your particular situation, which makes you want to object to our processing of your Personal Data. You also have the right to object where we process your Personal Data for direct marketing purposes.

- Request erasure of your Personal Data. You have the right to ask us to delete or remove Personal Data when there is no good reason for us to continue processing it.
- Request the transfer of your Personal Data. We will provide to you, or a third party of
 your choosing, your Personal Data in a structured, commonly used, machine-readable
 format. Please note that this right only applies to automated information, which you
 initially provided consent for us to use or where we used the information to perform a
 contract with you.
- **Withdraw your consent.** You have the right to withdraw your consent on using your Personal Data. If you withdraw your consent, we may not be able to provide you with access to certain specific functionalities of the Service.

Exercising of Your GDPR Data Protection Rights

You may exercise your rights of access, rectification, cancellation, and opposition by contacting us. Please note that we may ask you to verify your identity before responding to such requests. If you make a request, we will try our best to respond to you as soon as possible.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. If you are in the European Economic Area (EEA) and need more information, please contact your local data protection authority in the EEA.

CCPA Privacy

Your Rights under the CCPA

Under this Privacy Policy, and by law if you are a resident of California, you have the following rights:

The right to notice. You must be adequately notified of the categories in which Personal Data is collected and the purposes for which the Personal Data is used.

The right to access / the right to request. CCPA permits you to request and obtain information regarding the disclosure of Personal Data collected in the past 12 months by the Company or its subsidiaries to a third-party for their direct marketing purposes.

The right to say no to the sale of Personal Data. You also have the right to ask the Company not to sell your Personal Data to third parties. You can submit such a request to the Website Administration Team at webadmin@mrsppe.com with DO NOT SELL / OPT-OUT in the Subject Line.

The right to know about Your Personal Data. You have the right to request and obtain information from the Company regarding the disclosure of the following:

- o The categories of Personal Data collected,
- The sources from which Personal Data was collected,
- o The business or commercial purpose for collecting or selling Personal Data,
- Categories of third parties with whom we share Personal Data,
- The specific pieces of Personal Data we collected about you.

The right to delete Personal Data. You have the right to request the deletion of Personal Data collected in the past 12 months.

The right not to face discrimination. You have the right not to face discrimination for exercising any of your consumer rights, including but not limited to:

- Denying goods or services to you,
- Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties,
- o Providing a different level or quality of goods or services to you,
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of products or services.

Exercising Your CCPA Data Protection Rights

To exercise any of your rights under the CCPA, and if you are a California resident, you can email the Website Administration Team at webadmin@mrsppe.com with CCPA DATA REQUEST in the Subject Line.

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

Do Not Sell My Personal Information

We do not sell personal information. However, the Service Providers we partner with (for example, our advertising partners) may use technology on the Service that "sells" personal data as defined by the CCPA law.

If you wish to opt-out of the use of your personal information for interest-based advertising purposes and these potential sales as defined under CCPA law, you may do so by following the instructions below.

Please note that any opt-out is specific to the browser you use. You may need to opt-out on every browser that you use.

Website

You can opt-out of receiving personalized ads delivered by our Service Providers by contacting the Website Administration Team at webadmin@mrsppe.com with OPT-OUT in the Subject Line.

The opt-out will place a cookie on your computer that is unique to the browser. If you change browsers or delete the cookies saved by your browser, you will need to opt-out again.

Mobile Devices

Your mobile device may give you the ability to opt-out of information about the apps that may be targeted to your interests:

- "Opt-out of Interest-Based Ads" or "Opt-out of Ads Personalization" on Android devices
- "Limit Ad Tracking" on iOS devices

You can also stop the collection of location information from your mobile device by changing the preferences.

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

Our Service does not respond to Do Not Track signals.

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

Children's Privacy

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and are aware that your child has provided us with Personal Data, please contact webadmin@mrsppe.com with CHILDREN'S PRIVACY in the subject line. If we become aware that we have collected Personal Data from anyone under the age of 13 without verification of parental consent, we take immediate steps to remove that information from our servers.

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

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

If you'd like to request more information under California's Shine the Light law, please contact us using the contact information provided below.

California Privacy Rights for Minor Users (California Business and Professions Code Section 22581)

California Business and Professions Code section 22581 allows California residents under the age of 18 who are registered users of online sites, services, or applications to request and obtain removal of content or information they have publicly posted.

To request the removal of such data, and if you are a California resident, you can contact us using the contact information provided below and include the email address associated with your account.

Be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

Links to Other Websites

Our Service may contain links to other websites that are not operated by us. If you click on a third-party link, you will be re-directed to that third party site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. Any changes to any policy are posted to the website. If applicable, we will notify you via email or a prominent notice on the Resources Page to the changes becoming effective. "Last Updated" is at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

• By email: <u>info@mrsppe.com</u>