



Privacy Policy

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The Buck One Inc. (“Buck One,” “we,” or “us”) Privacy Policy describes the type of information we collect, how we use it, and the choices available to our customers (“you” or “your”) regarding the use of your information. Buck One is fully committed to protecting our customer’s information and endeavors to keep this information protected and secure.

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Buck One Inc. operates the Buckone.org website and associated application for mobile devices and the Buck One family of products. The debit card is offered by Metropolitan Commercial Bank (MCB) and Galileo as card issuer, which Buck One markets and assists customers obtain as part of the Buck One product line. By using any Buck One services and/or products, you accept this Privacy Policy and agree to the collection and use of your Personal Information in accordance with this Privacy Policy. The term **Personal Information** as used in this Policy describes information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, household, or device. Personal Information does not include information that has been aggregated or otherwise de-identified such that it does not identify a specific individual, household, or device.



This Policy describes privacy practices for users of the services described below who are 13 or older. Please see the **Buck One Children's Privacy Policy** within this Policy with respect to our privacy practices for children under 13 years of age. User accounts for minors under the age of 18 must be established by a parent or legal guardian.

PERSONAL INFORMATION BUCK ONE COLLECTS

We collect Personal Information in three ways: (1) information a customer provides directly to Buck One, (2) information indirectly collected by us, including collection within our application or other services, and (3) information we receive from third parties, as described further below.

Personal Information You Provide Us

When you visit, use, or otherwise interact with Buck One by contacting customer service, you may sometimes give Personal Information directly to us or to our third-party service providers (including, but not limited to, MCB or Galileo). To create an account to use the Buck One debit card, customers must be 18 years old or older (or a parent or legal guardian if creating an account for a user under 18). The creator of the account will provide the following Personal Information: account applicant's full name, email address, street address, phone number, date of birth, and the applicant's social security number (and driver's license information in some instances). This Personal Information is used to verify the applicant's identity and set up the account. The full name, birth date, email address and mobile phone number of a designee to help manage the account (spouse or grandparent) may also be requested from the applicant to establish such user rights within the applicant's account. Designating a sub-account or secondary approver is optional. The primary accountholder and secondary approver may see all Personal Information of accountholders across the account family (including transaction history).

When an individual requests that an account be created, we ask for the applicant's date of birth to determine whether the applicant is a minor or is 18 years old or older and eligible to set up their own account. If the requestor is younger than 18, we require that the child's parent or legal guardian complete the account creation process and disclose the minor's Personal Information to us. See also our **Buck One Children's Privacy Policy** section below regarding privacy practices regarding the Personal Information of children under 13 years old.

Buck One may, at times, invite accountholders from time to time to participate in surveys, sweepstakes, contests, and other promotional programs and participation will always be optional. If you decide to participate, you may be asked to provide information to enable Buck One to communicate with you, which may include Personal Information. If Buck One make a sweepstakes, contest, or other promotional offer available to non-accountholders, Buck One will disclose the Personal Information collected and why in the offer terms.

To fund the debit card account, to use the Buck One debit card, Buck One requests that the primary accountholder (or secondary approver if one is designated) transfer funds from a bank



account, debit card or any other source that may be approved in the future within the subscription services platform. Information collected to facilitate this transfer will be used to fund the debit card account.

When the primary accountholder or secondary approver elects funding by debit card, Buck One uses a third-party processor to process debit card payments. The third-party processor will collect your debit card information including the name appearing on the face of your debit card, card number, expiration date, and CVV. The third-party processor is expected to maintain such data in compliance with the card network rules and Payment Card Industry, Data Security Standards. Buck One does not receive Personal Information back from the third-party processor about customers.

Buck One may also collect personal information about you through our website or other services, which may include:

- Information you provide when filling out forms on our website or services. We may also request personal information when you report a problem with our website or services.
- Records and copies of your correspondence with us, including your email address, if you contact us.
- Details of transactions you carry out through our website and services.

Automatic Collection

Buck One collects certain information automatically to help manage, improve, and customize application and features and functionality of our website and Services. When customers use, visit, or otherwise interact with Buck One, we and our third-party service providers may use technology that stores or collects information sent to us by your computing device, browser, or mobile phone. This information may include your IP address, unique device identifier, or other unique identifier; device functionality, such as the type of browser, operating system, or hardware used; your device location, which may include a street name and city; activities within the Buck One platform, including the portions of the website and application customer's access; email address and mobile phone number; and other information. When customers utilize any Buck One digital product, we also collect information about customer transactions and activities related to using the Buck One debit card, which includes financial and payment information.

We collect this information using technologies include cookies (data files, pixel tags, or other local storage provided by a browser or associated applications) that may be stored on a customer's computer, browser, mobile phone, or other computing device. Customers are free to decline optional cookies if permitted by the computer, browser, mobile phone, or other device by activating the appropriate setting on such device.

We use this information for a variety of purposes, including enabling us to:



- Estimate our user audience size and usage patterns.
- Store information about our user's preferences, allowing us to customize our website and services to your interests.
- Recognize you when you return to our website or services.

Information from Third Parties

When customers utilize the Buck One software application, Buck One may receive the following information from your wireless provider: customer mobile number, name, address, email, unique mobile device identifier, and other details.

In addition to the Personal Information described above that Buck One obtains about the customer from Green Dot, Galileo, and the customer's wireless provider, Buck One may also obtain information about you from third parties, including, but not limited to, identity verification services.

WEB BROWSER *DO NOT TRACK* SIGNALS, OTHER TRACKING

Some web browsers transmit *do not track* signals to websites. Buck One's Application currently does not act in response to these signals. Except for Buck One third-party/service providers, which help deliver Buck One products, we do not authorize any third party to track your use of Buck One products/services or track what other activities a user may have engaged in before or after using the Buck One platform (e.g., using a different application or website).

PERSONAL INFORMATION USE

Buck One may use a customer's Personal Information for one or more of the following purposes:

- create, fund, maintain, customize, and secure customer debit card accounts;
- process and analyze account transactions and payments, notify customers about them, and audit the accounts as needed or required by law;
- provide customer support to customers;
- deliver service update notices and promotional offers, answer questions and respond to customer requests, and otherwise to communicate with you;
- maintain the security, availability, and integrity of Buck One products, our technology, assets, and business;
- engage in detection and prevention of fraud or other illegal activities and debugging;



- enforce our Terms of Service and the Cardholder Agreement, including to prevent potential security breaches or loss of personal information;
- respond to law enforcement requests and as required by applicable law, court order, or US governmental regulations;
- perform identity verification on our own behalf and on behalf of the bank that issues the Buck One debit card (MCB);
- test, personalize, develop, and improve Buck One products, including to create new analytics, algorithms, or other tools, so we can better cater to customer interests;
- lock and unlock customer debit cards;
- facilitate, manage, and confirm referrals from our business partners;
- market our products and services to you, including by presenting tailored content, and feature notices through the Buck One website, third-party sites, in-application notifications, emails, or text messages (with customer consent, where required by law);
- to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our customers is among the assets transferred;
- in any other way we may describe when you provide the information or as otherwise allowed by applicable law; and
- for any other purpose with your consent.

PERSONAL INFORMATION SHARING

The Buck One debit card is issued by MCB. As the card issuer, MCB has a contractual relationship with each primary account holder through the cardholder agreement that accompanies the account and each debit card. MCB engages Buck One (supported by Galileo) as a service provider in its capacity as the program manager for the Buck One card program responsible for marketing, distribution, and operation of the Buck One debit card program. As MCB's agent for purposes of performing identity verification on primary account holders and other operational services, Buck One and Galileo shares Personal Information it collects on behalf of MCB with MCB to enable MCB to issue a bank account to the primary account holder and to issue Buck One debit cards to any sub-accounts they designate (e.g., children). MCB's privacy policy is available at <https://www.mcbankny.com/privacy-policy/>.

Buck One may also share Personal Information with third parties, as follows:



- Service Providers. We engage with select service providers who provide services to support our operations such as: open banking interface providers (MCB, Green Dot, etc.); payment processors (including third parties and automated clearinghouse (ACH) payment processors); identity verification services; cloud hosting providers (AWS, Moodle); marketing vendors such as email distribution providers; video streaming technology providers supporting learning management systems/platforms to deliver learning experiences and other service providers.
- Certain Mobile Carriers. If you access a Buck One product with a mobile device, your device may transmit your request via your mobile carrier's network and your carrier may have access to any information that is transmitted. You, the customer, should consult your carrier's privacy policy for more information.
- Business Partners. Buck One may share customer personal information with our business partners, affiliates, and for our affiliates internal business purposes or to provide you with a product or service you request.
- Other Parties. As further described in PERSONAL INFORMATION USE above, Buck One may share customer information when we have reason to believe that disclosing the information is necessary to prevent fraud, damage to person or property, protect and secure our business, assets, user accounts or enforce legal rights or comply with subpoena, court order, legal process, or obligations. We reserve the right to disclose any Personal Information as needed if that information is requested by US law enforcement agencies or if Buck One is required to do so by law or court order.
- Successor Entities. We reserve the future right to disclose or transfer your Personal Information to a successor entity in the event of a corporate merger, consolidation, sale of assets or other corporate changes.

Please be aware that users of Buck One products may disclose Personal Information to other members of their account family or to application stores in connection with downloads as follows:

- A sub-account cardholder's Personal Information, including but not limited to, established spending parameters, pending transactions, approved purchases, and transaction history, will be shared with the linked primary accountholder and with their secondary approver to manage the account, if any, who can access the information from the account dashboard in the Application.
- The first and last name, or any designated account name, of the primary accountholder and sub-account cardholders are known to one another and used to communicate between the accounts. Individual users within an account family may also disclose their Personal Information to one another while using the Buck One Application/products.



- When a user downloads the Buck One Application from Apple®, Google® or any other third-party platform from which it may become available, the user provides certain Personal Information to the third-party platform to complete the download, and it may be necessary to receive updates to the Application through the platform, according to its privacy policy and terms.

THIRD PARTY SERVICES

Buck One Products may contain links to third party websites (MCB, Galileo, Green Dot, or similar websites) that may be of interest to our customers. If customers follow a link to any of these websites, please be aware that these third parties have their own privacy policies, and that Buck One does not control or accept any liability for such third-party privacy policies or practices.

CUSTOMER RIGHTS AND CHOICES

Buck One maintains the preferences a primary accountholder has provided to us regarding the use, collection, and sharing of information. This includes how Buck One contacts customers.

- Marketing Preferences. Each recipient of our marketing emails may unsubscribe from the emails from within each marketing email, but please note that you may continue to receive emails with Buck One account-related information.
- Account Information. The primary accountholder and any secondary approver they designate to oversee the account and any sub-accounts linked to the primary account have access to information about child accounts/sub accounts unless and until a subaccount is closed. However, one sub-account cannot view information in another sub-account.
- Update Your Information. Personal Information of accountholders can be reviewed and edited at any time by logging in to the primary account and reviewing the account settings and profile across the family of accounts. It is the primary accountholder's responsibility to make sure that Personal Information of users in the account family is accurate across the primary account and linked sub-accounts. The primary accountholder should promptly update your account family's Personal Information on the Application if Personal Information changes or requires an update.
- Closing Account(s). The primary accountholder can close the primary account or any sub-account by contacting Customer Service and completing a customer service ticket on the website (www.buckone.org) or through the Application log-in screen. Additionally, customers may email customerservice@buckone.org and close their account by providing their full name and email address linked to the account. If they close an account, the account will no longer be accessible to the accountholder and Buck One will mark the account in our database as *Closed* but may retain Personal Information from the account



to collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud, enforce the Cardholder Agreement and Terms of Service, or take other actions as required or permitted by law.

- **Deletion of Personal Information.** If a customer requests Buck One to delete your account information, Buck One will delete as much information as legally permitted. Due to regulatory recordkeeping obligations, Buck One may be unable to delete all information associated with a closed account and may be required to retain information related to each account holder and their Buck One debit card account and to comply with applicable laws or statutes.
- **Opt-Out Rights.** Buck One provides opt out rights available to California residents appearing in the **CALIFORNIA PRIVACY RIGHTS** section of this Privacy Policy available to other individuals in the US on the same basis as California residents.

PRIVACY POLICY FOR CHILDREN

The PRIVACY POLICY FOR CHILDREN explains the collection, use, and parental consent practices in connection with Personal Information of children under 13 years of age in accordance with the Children's Online Privacy Protection Act (COPPA). This PRIVACY POLICY FOR CHILDREN uses defined terms from the rest of this Policy.

Information Collected, How It is Used, and How and When We Communicate with Parents

During the registration process to create a primary account for use of Buck One products, regardless of whether registration occurs on the website or within the Application, Buck One will first ask the individual attempting to register for their mobile phone number, whether they are a parent/guardian or a child, then we ask the individual for their date of birth. If the date of birth indicates that the individual is a child younger than 13, then the child receives a message indicating that the child will need a parent or guardian to create an account, and the child is shown a message to tell their parent or guardian about Buck One and have their parent download the Application and sign up. In addition, the registration session ends for that individual, we do not retain the mobile phone number or birthdate information and no further registration information is collected. If the individual is 13 years or older but younger than 18, then we will request the minor to provide a first and last name, an email address and password, and a parent's cell phone number so that we can provide the parent with information about how to download the Application and finish registering an account.

Buck One requests during the registration process that the parent (or legal guardian) establishing child accounts represent that they are the parent or legal guardian of minors under the age of 13 for whom the account is established and that they consent to our collection and use of the child's Personal Information in accordance with this PRIVACY POLICY FOR CHILDREN section of this Policy.



When a parent (or legal guardian) adds a child within the account, they provide Buck One with the first and last name, and mobile phone number, of a child under 13 to establish the child as a child account cardholder. The child is then invited to download the Buck One Application from the Apple® App Store or Google® Play and, upon doing so, are requested to enter an email address and password. Once a child under 13 starts using the Application, Buck One collects and maintains transactional data and history from the debit card services to provide a Buck One product or services to them.

Parents (and legal guardians) can access Personal Information of a child under 13 from the account dashboard, as described in more detail immediately below.

Information is Available to Others

Members of Account Family. Parents (or legal guardians), as primary accountholders, and any secondary approver can see the name, username, email address, and mobile phone number of the child account as part of the account family dashboard. They also have access to all transaction details in their sub-accounts (such as purchase history details and Invest Account trade details). Child accounts cannot see one another's data (this includes Personal Information), data relating to child accounts is only visible to that child, primary accountholder that created, designated the child-account, and the secondary approver (e.g., spouse, grandparent) designated by the primary accountholder.

Card Issuer. The primary accountholder provides MCB, as card issuer, with access to their child's Personal Information to issue a debit card and account to any child account cardholder designated by the primary accountholder.

Service Providers. To provide Buck One products, it may also share a child's Personal Information, as necessary to perform Buck One services, with select service providers or other third parties who provide services to support Buck One operations. This includes, but not limited to, the following: card manufacturing and fulfillment providers; insurance providers for mobile phone protection and purchase protection; cloud hosting providers (AWS, Moodle); email distribution providers; and other service providers.

Certain Mobile Carriers. If a child accesses a Buck One product through a mobile device, the child's device may transmit the request via the mobile carrier's network and the carrier may have access to any information that is transmitted. Customers should consult with the carrier's privacy policy for additional information.

Legal Requirements and Fraud Protection. Buck One may share a child's Personal Information when we have reason to believe that disclosing the information is necessary to prevent fraud, damage to person or property, protect and secure our business, assets, user accounts or enforce legal rights or comply with subpoena, court order, legal process, or obligations. We reserve the



right to disclose any Personal Information if that information is requested by US law enforcement agencies or if required to do so by law or court order.

Parental Choices and Controls

The primary accountholder can update or change Personal Information of a child at any time through the account settings.

At any time, a primary accountholder can refuse to permit us to collect further Personal Information of a child by closing that sub-account by contacting Buck One Customer Service via email at customerservice@buckone.org or completing customer service request within the Application. If you close an account, Buck One Customer Service will mark the account in our database as Closed, but may retain Personal Information from the account to deactivate the account with our service providers, allow the primary accountholder to reactivate the account for some period in the future, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud, enforce the Cardholder Agreement and Terms of Service, or take other actions as required or permitted by US law.

If a customer requests to delete your child's sub-account information, we will delete as much information as we are legally permitted. Due to regulatory, banking, and treasury department obligations, Buck One may be unable to delete all information associated with a closed sub-account and may be required to retain information related to each sub-account cardholder, their card account.

Parents of children under 13 who are California residents may have additional rights to know and delete sensitive or Personal Information of their children. Please refer to CALIFORNIA PRIVACY RIGHTS section below.

NOTICE TO RESIDENTS OF OUTSIDE UNITED STATES

Buck One is headquartered in the United States and Buck One products and services are only intended for residents of the United States. If you are located outside of the United States, be advised that any Personal Information provided to us will be transferred to and stored in the United States and by submitting information you explicitly authorize its transfer and storage within the United States. Buck One reserves the right to use service providers in the United States and elsewhere as necessary to deliver our family of products. Buck One will protect the privacy and security of Personal Information according to this Privacy Policy regardless of where it is processed or stored.

CHANGES TO POLICY

Buck One reserves the right to modify this Privacy Policy at any time and may apply changes to previously collected information, as permitted by applicable law. From time to time, we may change or update this Privacy Policy and will give notice of material changes as required by



applicable law. We encourage you to review this Privacy Policy from time to time for any updates. You acknowledge and agree that we may notify you about any material changes in the way Buck One treats Personal Information by giving customers notice, including by posting an updated version of this Privacy Policy on the company website. Your continued use of Buck One products after any such notice shall constitute your acceptance of such changes. If you do not agree with any such changes, please stop using Buck One and its services and/or products.

CONTACT US

If you have questions about this Privacy Policy or our information practices, please contact us by email at customerservice@buckone.org or visiting the website at www.buckone.org.

CALIFORNIA PRIVACY RIGHTS

The information included in this section applies to residents of California.

For Do Not Sell My Personal Information requests, please complete the customer service request at www.buckone.org or within the Application.

If you have questions about this Privacy Policy, including anything in this section for California residents, or would like a printed copy of this Privacy Policy, please contact us at by email at customerservice@buckone.org

Notice of Collection and Use of Personal Information

For details on the Personal Information Buck One collects about California residents in the last 12 months, the sources of that information, Buck One business or commercial purposes for collecting that information, and the third parties with whom we shared that information, please refer to the corresponding sections of this Privacy Policy as follows:

- See PERSONAL INFORMATION USE for the categories of Personal Information collected and specific examples, sources from which, and how, we collected Personal Information
- See PERSONAL INFORMATION SHARING for our business or commercial purposes for collecting Personal Information
- This section applies to California residents of all ages, but please also see PRIVACY POLICY FOR CHILDREN for a more detailed description of how Buck One addresses Personal Information of children under 13 years old

Categories of Personal Information Collected



Buck One collects the following categories of Personal Information from or about California residents who are primary accountholders or secondary approvers within the last twelve (12) months:

- Identifiers. See PERSONAL INFORMATION USE for a description of the Identifiers that we have collected from California residents.
- Personal information described in California Customer Records Statute. See PERSONAL INFORMATION SHARING for a description of items such as bank account numbers and debit card numbers used as funding sources for Buck One accounts.
- Protected classification characteristics under California or federal law. See PERSONAL INFORMATION SHARING for a description of items such as age and gender collected from California residents.
- Commercial information. See PERSONAL INFORMATION SHARING for a description of commercial information that Buck One collects from California residents.
- Internet or other similar network activity. See PERSONAL INFORMATION SHARING for a description of these items that we have collected from California residents.
- Inferences drawn from other Personal Information. Buck One may draw inferences about customer preferences and future activities from the information provided by the customer.

We will not collect additional categories of Personal Information or use the Personal Information collected for materially different, unrelated, or incompatible purposes without providing the customer sufficient notice.

How Buck One Discloses or Sells Personal Information

The following describes how we disclose, or share, information to third parties and the limited cases in which it may be considered a sale based on the California Consumer Privacy Act's (CCPA) broad definition of the word sale.

- See PERSONAL INFORMATION SHARING for third parties with whom we disclose Personal Information.
- Buck One does not sell customer Personal Information in exchange for money. However, Buck One may share Personal Information with certain third parties for marketing purposes which, under California's privacy laws, may be considered a sale. Buck One may share the following categories of Personal Information with third parties for marketing purposes: your full name, date of birth, gender, postal address, email address, phone number, Internet Protocol (IP) address, browser information, and device



information. If you wish to opt-out of this disclosure of your personal information, please see the section [Right to Opt-Out of Sale](#) below.

- Buck One does not knowingly sell Personal Information of minors under 18.

CCPA Rights and How to Exercise Them

If you are a California resident, you have certain rights, pursuant to the CCPA. These CCPA rights may only apply in certain circumstances and are subject to certain exemptions. Please see the information below for a summary of rights, how to exercise your rights and the information we require to respond to your requests. Please note that we may ask for certain information to verify the request in accordance with applicable law. If you are a child under 18, Buck One may request that your parent or legal guardian exercise these rights on your behalf as indicated below.

- Right to Know or Access. You have the right to request that we disclose the categories of Personal Information we collected, used, disclosed and/or sold about you in the last 12 months. You also have the right to request access to the Personal Information (specific to you) that we collected, used, disclosed, or sold about you in the last 12 months. To exercise your right to know or access, please contact us to submit your request by email at customerservice@buckone.org. You will be required to provide certain information which we will use to verify you and your request. If you are an account holder under age 18, your parent or legal guardian must submit your request on your behalf. Non-accountholders under the age of 13 must also have a parent or legal guardian submit the request on your behalf.
- Right to Delete. Customers have the right to delete Personal Information that Buck One collects or maintains, but we likely will be unable to further provide services provided through an account to you if you exercise this right. To request deletion of your information, please contact us to submit your request by email at the following email address: customerservice@buckone.org or by completing a customer service request online via the Application or website at www.buckone.org. Customers will be required to provide information which we will use to verify your identity and your request. Please note that certain exceptions apply to this right, such as when we retain your information to comply with law, or to complete the transaction for which the Personal Information was collected, or to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity. We will notify you of any such exceptions as applicable to your request. If you are an accountholder under age 18, your parent or legal guardian must submit your request on your behalf. Non-accountholders under the age of 13 must also have a parent or legal guardian submit the request on your behalf.



- Right to Opt-Out of Sale. We do not sell your Personal Information for money. However, to be able to offer a product or service, Buck One may share Personal Information of users who are 18 or older in a manner that could be considered a sale in California. Under California's privacy laws, certain marketing activities may be considered a sale of Personal Information based on a broad definition of the word sell.

If you are a California resident, customers have the right to opt out from the sale of Personal Information. We also provide this right to Opt-Out of Sale to residents of other states. To exercise this right, customers may complete a customer service request at www.buckone.org or through the Application. You may also submit your request by email at customerservice@buckone.org. These requests will opt out of sales that are tied to your name and account.

If you are a California resident, 18 or older, you have the right to opt out from the sale of Personal Information. We also provide this right to Opt-Out of Sale to residents of other States. If you would like to exercise this right, customers may request to 'Do Not Sell My Personal Information' by submitting a customer service request via the Application or through the website at www.buckone.org. You may also submit your request by email at customerservice@buckone.org.

- Right to Non-Discrimination. Customers have the right not to receive discriminatory treatment by us for the exercise of any of your CCPA rights.
- Right to an Authorized Agent. Customers can exercise your CCPA rights yourself or you can designate an authorized agent to make a request on your behalf. Your authorized agent must be able to demonstrate authority to act on your behalf as further instructed when submitting a verifiable request.

Third-Party Marketing Disclosure

Under California Civil Code Section 1798.83 (Shine the Light Law), California residents with whom we have a business relationship can request certain information regarding what types of Personal Information shared with third parties for the direct marketing purposes of the third parties and the identities of the third parties with whom the business has shared such information in the immediately preceding 12 months. Customers may request this information by contacting us using the contact information at the top of this CALIFORNIA PRIVACY RIGHTS section or contact us.