



POPID PRIVACY POLICY

LAST UPDATED: June 18, 2024

OUR COMMITMENT TO PRIVACY

PopID, Inc. (“PopID,” “we,” “us,” and “our”) knows that you care about how your personal information is used and shared, and we take your privacy seriously. Our primary goal is to provide you with exceptional service, and we understand that you may have questions or concerns regarding your personal information and how it will be used.

To make this privacy policy easy to find, we make it available from the home page of the PopID website at popid.com (the "website") by clicking the link at the bottom of the page labeled “Privacy Policy,” at the webpage located at popid.com/privacy, and through our mobile applications. You may also email us at privacy@popid.com to obtain a copy of our Privacy Policy or with any privacy-related questions you have.

APPLICABILITY OF PRIVACY POLICY

This privacy policy applies to all information we collect through our Service from ANY person, including our current and former PopID and PopPay users, or anyone else who utilizes any part of our Service, including but not limited to any of our terminals or kiosk, regardless of their intent.

For example, you expressly agree to be bound by this Privacy Policy, including our collection and use of your photos, and our use of biometrics on your photos to identify you and confirm you are a live person, regardless of whether or not you have registered for a PopID profile or PopPay account, if:

1. you click any button on any kiosk, PayPad, or other device using a PopPay service that says, “check in with PopPay,” “tap to start with PopPay,” or similar statement you are bound by the terms of this Privacy Policy;
2. you advise any cashier or merchant that you want to check in with PopPay, use PopPay, pay with PopPay, or similar statements; or
3. You give a verbal or non-verbal response that is interpreted as an affirmative response to a cashier’s or merchant’s question if you want to check in with PopPay, use PopPay, pay with PopPay or any similar statement or question.

These examples are merely illustrative and in no way limit the general applicability of this Privacy Policy to any Person who uses any part of our Service or our terminals.

“Site” or “Service(s)” means any products, kiosks, POSs, PayPads, terminals, cameras, services, content, features, technologies, or functions, and all related websites, applications, and services offered to you by PopID, Inc., including PopPay. If you are not a PopPay account holder or customer and utilize any of the Site, or if you are a former PopPay user or customer, we use and share your Personal Information as described in this policy.

DEFINITIONS

Capitalized terms used in this Privacy Policy have the definition provided in this Privacy Policy. Capitalized terms used in this Privacy Policy that are not specifically defined have the definition provided in the PopID and PopPay User Agreement.

THE INFORMATION WE COLLECT

The Service contains connections to websites, applications, loyalty programs, payment systems, entry systems, and similar platforms, as well as services provided by our partners or third-party service providers, such as NEC, Amazon, Dwolla, Plaid, Heartland, and our credit card/debit card/electronic funds transfer (e.g. ACH) processing partners (collectively, the “Third-Party Services”) that are provided or hosted by PopID’s Merchant partners, service providers, and other third parties (collectively, “Third Parties,” and each a “Third Party”).

You acknowledge that in registering for a PopID Account or PopPay Account, and through use of the Site, or certain portions of the site, including but not limited to PopPay and your registration and use of an Account, we will receive information from you and Third Parties which is personal to you including, without limitation, your name, contact information, bank account details, loyalty data, food ordering data, items purchased and prices, as well as “Biometric Information,” including images of you, biometric identifiers, vectors, and other biometric information (collectively, “Personal Information”). Personal Information is information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been aggregated and/or anonymized so that it does not identify a specific user. Through your use of your PopID Account or PopPay Account, we will also receive and collect information of an aggregate and anonymous information (“Non-Personal Information”).

You acknowledge that to use the Site, you must provide certain personal information to us, including, but not limited to, with respect to the registration and use of your Account, certain Personal Information, including your Biometric Information. You expressly consent to our collection of the Biometric Information, Third Parties’ (as defined below) collection of the Biometric Information, and the sharing of the Biometric Information with Third Parties (as defined below), for the purpose of authenticating your identity in relation to your use of the Site and Third-Party Services. The Biometric Information will be collected, stored, and used up to the date that it is destroyed as specified in this Privacy Policy.

Additionally, to continually enhance our technology-based system and support our ongoing efforts to improve the performance of the Service, we may temporarily store images taken by PopPay and PopID devices. You expressly consent to our collection of Personal Information, including Biometric Information, Third Parties’ collection of Personal Information, including Biometric Information, and the sharing of Personal Information, including Biometric Information with Third Parties, for the purpose of authenticating your identity in relation to your use of the Site and Third-Party Services.

You expressly consent to the use of your Personal Information and Non-Personal Information in accordance with this Privacy Policy. You acknowledge and agree that: (a) we may collect your

Personal Information and Non-Personal Information; (b) we may share your Personal Information and Non-Personal information with your Bank, the Merchants at which you use the Service, and our partners and Third-Party Service providers, including our payment processors, as reasonably necessary (collectively the “Authorized Receivers,” and each an “Authorized Receiver”); and (c) the Non-Personal Information, without limitation, with any other person or entity.

You further acknowledge and agree that: (i) the Third Parties are solely and exclusively responsible for the Third-Party Services and any content offered on or in connection therewith; (ii) Your use of the Third-Party Services is subject to and conditional upon your acceptance of any terms, conditions or policies implemented by the applicable Third Parties, from time to time; (iii) under no circumstances shall we be liable in any way for any disconnections to, content provided by, or errors or omissions in, the Third-Party Services; (iv) we will share your identity and personal information (including your Biometric Information) with such Third Parties solely in relation to your use of the Third-Party Services; and (v) we reserve the right, in our sole and absolute discretion, to discontinue and/or remove any Third-Party Services from the Service.

When you visit the website or use one of our mobile applications, or other part of our Site or Service, we collect your IP address, and standard web log information, such as your browser type and the pages you accessed on our website. We also may collect Geolocation Information (defined below). If you do not agree to our collection of this information, you may not be able to use our Service. If you open a PopID Account, we may collect the following information from you:

- Account and Profile Information - text-enabled cellular/wireless telephone number, machine or mobile device ID and other similar information and may include name, email address, phone number, address, company name, state, country, date of birth, SSN (or other governmental issued verification numbers), photos, biometric identifiers, vectors, and other biometric information (the last four items are collectively referred to as “Biometric Information”).
- Service Information: When you use our Service, we receive information generated through the use of the Service, either entered by you or others who use the Service, or from the Service infrastructure itself. This information may include, but is not limited to, name, username, company/organization, company/organization address, email address, phone number, IP address, MAC address, latitude, longitude, device name(s), device ID(s), and directory ID or other information you place within the Service.
- Device Information - information about you: (a) from your mobile device or computer such as your device type, machine or mobile device identification number, Geolocation Information, time zone, language setting, browser type, and IP address, and (b) from third parties for purposes of transaction processing, identity verification, fraud detection or prevention and other similar purposes. For fraud prevention purposes, we also may link your machine ID with the machines of others who use your same payment cards.
- Geolocation Information - information that identifies with reasonable specificity your location by using, for instance, longitude and latitude coordinates obtained through GPS, Wi-Fi, or cell site triangulation. We will collect this data for fraud and risk purposes. In addition, some parts of our Service may ask you for permission to share your current location within your device settings to enhance our Service. If you do not agree to our collection of Geolocation Information, our Service may not function properly when you try to use them. For information about your ability to restrict the collection and use of

Geolocation Information to enhance our Service, please refer to the settings available in your device.

- Financial Information – bank account online login information, bank account and routing numbers, bank account details, including balance and transaction information, credit cards numbers and details.
 - If you are a merchant, as part of your business relationship with us, we may receive financial about you such as your date of birth and government identifiers associated with you and your organization (such as your social security number, tax number, or Employer Identification Number), bank account online login information, bank account and routing numbers and credit cards linked to your PopPay account.
 - If you are a user, when you make payments or conduct transactions through a PopID merchant we will receive your transaction information. Depending on how the PopID implements our Service, we may receive this information directly from you, or from the PopID merchant or third parties. The information that we collect will include payment method information (such as credit or debit card number, or bank account information), purchase amount, date of purchase, and payment method. Different payment methods may require the collection of different categories of information.
 - Open Banking Data: One type of Personal Information you agree to share with us is the details regarding your bank account from your financial institution (“Open Banking Data”) when you enroll your bank account as a Payment Method. When you add your bank account a Payment Method through Plaid (or a similar service we use), you agree to Plaid (or similar entity) establishing a connection between your bank account and us so that we may obtain Open Banking Data regarding your account as long as you maintain that bank account as a Payment Method. We use the Open Banking Data you share with us to make decisions regarding you and your PopID Account, including whether or not to approve transactions you attempt to make, establishing and adjusting limits on your account and transaction, as well as for us to decide, in our sole and absolute discretion, to offer or provide you with interest free, cash flow advances.
 - Information from Third Parties: We receive information from third party business partners such as the contact details of prospects and sales leads. In addition, we collect information from public databases or other data you may have made publicly available, such as information posted on professional networks and social media platforms.

We are committed to providing a safe, secure, and all-around great service. Therefore, before permitting you to use the Service, we may require additional information from you we can use to verify your identity, address, or other information or to manage risk and compliance throughout our relationship. We may also obtain information about you from third parties such as identity verification, fraud prevention and similar services. When you are using the Service, we collect information about your account transactions, and we may collect Geolocation Information and/or information about your computer or other access device for fraud prevention and other similar purposes. Finally, we may collect additional information from or about you in other ways not specifically described here. For example, we may collect information related to your contact with our customer support team, store results when you respond to a survey, or when you use PopPay or another PopID Service.

INFORMATION FROM CHILDREN

The Children's Online Privacy Protection Act of 1998 and its rules (collectively, "COPPA") require us to inform parents and legal guardians (as used in this policy, "parents") about our practices for collecting, using, and disclosing personal information from children under the age of 13 ("children"). COPPA and the GDPR also require us to obtain verifiable consent from a child's parent for certain collection, use, and disclosure of the child's personal information. We do not collect any personal identifiable information from children. At any time, you or the parents may review the child's personal information maintained by us, require us to correct or delete the personal information, and/or refuse to permit us from further collecting or using the child's

information by logging into the child's account or contacting us as indicated in the Contact section of this Policy.

The Service is not directed to children under the age of 13. If we obtain actual knowledge that we have collected personal information from a child under the age of 13, we will promptly delete it, unless we are legally obligated to retain such data. Contact us as indicated in the Contact section below if you believe that we have mistakenly or unintentionally collected information from a child under the age of 13.

HOW WE USE COOKIES

When you visit or use our Service or visit a third-party website for which we provide online services, we and certain business partners and vendors may use cookies and other tracking technologies (collectively, "Cookies"). Cookies (or browser cookies) are small files placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our website.

Flash Cookies. Certain features of our website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our website. Flash cookies are not managed by the same browser settings as are used for browser cookies.

We use Cookies to recognize you as a customer; customize Services, other content, and advertising; measure the effectiveness of promotions; perform a wide range of analytics; mitigate risk and prevent potential fraud; and to promote trust and safety across our Services. Certain Services are only available through the use of Cookies, so if you choose to disable or decline Cookies, your use of our Service, or certain parts of our Service, may be limited or not possible. Do Not Track: Do Not Track ("DNT") is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third parties. We do not respond to DNT signals.

HOW WE PROTECT & STORE PERSONAL INFORMATION

We store and process your personal information using third party servers located in data centers in the United States. This information is protected by physical, electronic, and procedural safeguards in compliance with applicable US federal and state regulations. We also use computer safeguards

such as firewalls and data encryption, we enforce physical access controls to our office and files, and we authorize access to personal information only for those employees who require it to fulfill their job responsibilities. We strive to ensure security on our systems. Despite our efforts, we cannot guarantee that personal information may not be accessed, disclosed, altered, or destroyed by breach of our administrative, managerial, and technical safeguards. Therefore, we urge you to take adequate precautions to protect your personal data as well, including never sharing your PopPay Account. If PopPay learns of a systems security breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Service, you agree that PopPay may communicate with you electronically. PopPay may post a notice on the website or mobile application if a security breach occurs. We may also send an email to you at the email address you have provided to us. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive free written notice of a security breach (or to withdraw your consent from receiving electronic notice of a security breach), please email us at privacy@popid.com.

HOW WE USE THE PERSONAL INFORMATION WE COLLECT

Our primary purpose in collecting personal information is to provide you with a safe, smooth, efficient, fun, and customized experience. We may use your personal information to:

- provide the services and customer support you request;
- process transactions and send notices about your transactions or your network activity;
- resolve disputes, collect fees, and troubleshoot problems;
- prevent potentially fraudulent, prohibited, or illegal activities, and enforce our User Agreement through the use of our risk and fraud tools which may include use of Account Information, Identification Information, Financial Information, Device Information, Open Bank Data, and Geolocation Information;
- create an account connection between your PopPay account and a third-party account or platform;
- customize, personalize, measure, and improve our services and the content and layout of our website;
- send you updates about new products and services that we are offering to customers;
- compare information for accuracy and verify it with third parties;
- perform other duties as required by law; and
- if you elect to share your Geolocation Information, we will use this information to enhance the security of the Service and we may use this information to provide you with location-specific options, functionality, offers, advertising, search results, or other location-specific content.
- If you elect to share your Open Banking Data, we will use this information to make decisions regarding you and your PopID Account, including whether or not to approve transactions you attempt to make, establishing and adjusting limits on your account and transaction, as well as for us to decide, in our sole and absolute discretion, to offer or provide you with interest free, cash flow advances.

HOW WE SHARE PERSONAL INFORMATION WITHIN THE POPPAY PLATFORM

To register for an PopID Profile, PopPay Account, or a Merchant Account, and to process Transactions on PopPay, we need to share some of your personal information with the person or company that you are paying or is paying you. Your contact information, date of sign-up, the

number of payments you have received and other verification metrics like social graph activity may be provided to users or companies when you transact with, on, or through PopPay. We work with vendors to enable them to accept payments from you using PopPay. In doing so, a vendor may share information about you with us, such as your mobile phone number or PopPay username, when you attempt to pay that vendor. We use this information to confirm to that vendor that you are a PopPay customer and that the vendor should enable PopPay as a form of payment for your purchase. Regardless, we will not disclose your credit card number or bank account number to anyone you have paid or who has paid you through PopPay, except with your express permission or if we are required to do so to comply with a subpoena or other legal process. You agree that we have the right to share your Personal Data with Businesses that you elect to use PopID to authenticate your identity, including for participating in loyalty or making payments.

HOW WE SHARE PERSONAL INFORMATION WITH OTHER PARTIES

PopID does not share your personal information with third parties for their promotional, advertising, or marketing purposes, including for cross-contextual behavioral advertising purposes.

Some personal information is public information and may be seen by anyone on the internet, whether or not they have a PopPay Account. Public information may also be seen, accessed, reshared, or downloaded through PopID's APIs or third-party services that integrate with our products.

- Public information for personal profiles may include your PopPay username, photos, first and last name, month, and year of PopPay account creation, and public transactions in which you've been involved.
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We may share your personal information with:

- PopID, Inc. and affiliates and subsidiaries it controls, but only for purposes allowed by this document.
- Companies that PopID, Inc. plans to merge with or be acquired by or, in the event of any bankruptcy, a bankruptcy estate. Should such a combination occur, we will require that the new combined entity follow this privacy policy with respect to your personal information. If your personal information could be used contrary to this policy, you will receive prior notice and the opportunity to communicate preferences you may have, if applicable.
- Law enforcement, government officials, or other third parties if PopID is compelled to do so by a subpoena, court order or similar legal procedure, when it is necessary to do so to comply with law, or where the disclosure of personal information is reasonably necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of the PopPay User Agreement, or as otherwise required by law.
- Third party service providers who assist us in providing the Service to you or who provide fraud detection or similar services on our or any vendor's behalf.
- The other PopPay user or merchant participating in the transaction and, depending on the privacy setting of each PopPay account transaction, your PopPay friends and the PopPay friends of the other user participating in the transaction, or the public, through the PopPay feed on our website and mobile application and elsewhere on the internet.
- Service providers under contract who help with parts of our business operations (for example, fraud prevention, payment processing, or technology services). Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.

- Analytics and search engine providers that assist us in the improvement and optimization of our site.
- Other third parties with your consent or at your direction to do so, including if you authorize an account connection with a third-party account or platform.
- For the purposes of this privacy policy, an "account connection" with such a third party is a connection you authorize or enable between your PopPay account and a non-PopPay account, payment instrument, or platform that you lawfully control or own, or that you lawfully may join, such as a merchant's loyalty program. When you authorize such a connection, PopPay and the third-party will exchange your personal information and other information directly. Examples of account connections include, without limitation: linking your PopPay account to a merchant's loyalty program; linking your PopPay account to a social media account or social messaging service; connecting your PopPay account to a third-party data aggregation or financial services company, if you provide such company with your PopPay account log-in credentials; or using your PopPay account to make payments to a merchant or allowing a merchant to charge your PopPay account.
- If you connect your PopPay account to other financial accounts, directly or through a third-party service provider, we may have access to your account balance and account and transactional information, such as purchases and funds transfers. If you choose to create an account connection, we may receive information from the third-party about you and your use of the third-party's service. We will use all such information that we receive from a third-party via an account connection in a manner consistent with this privacy policy.
- Information that we share with a third-party based on an account connection will be used and disclosed in accordance with the third-party's privacy practices. Before authorizing an account connection, you should review the privacy notice of any third-party that will gain access to your personal information as part of the account connection. For example, personal information that PopPay shares with a third-party account or platform may in turn be shared with certain other parties, including the general public, depending on the account's or platform's privacy practices.

PopID does not send your personal information to third-party social networks unless you have specifically requested or authorized us to do so. When you broadcast information to such third-party social networks, such information is no longer under the control of PopID and is subject to the terms of use and privacy policies of such third parties.

CONSENT TO POPID'S VAULTING OF BIOMETRIC DATA WITH THIRD PARTY

As part of our efforts to continuously improve and enhance the Service, in the future, we may transfer all user's registration image(s), along with certain personal information collected from each user including your First Name, Last Name, phone number, email address, and a unique identification number ("Biometric Vault Data"), to a third party, selected in our sole discretion, to vault this data for us. By registering for a PopID account, or using the Service, your expressly consent to us electing at some point in the future, to vault the Biometric Vault Data collected from you, including your registration image(s), with a third party, selected in our sole discretion, without obtaining further consent from you.

Prior to us transferring the Biometric Vault Data, we will provide you notice regarding the transfer and the date they will begin. However, you agree that we will not need to obtain further consent from you to proceed with the transfer of the Biometric Vault Data to the third party we select.

If you do not consent to PopID's right to transfer the Biometric Vault Data collected from you, including your registration image(s), to a third party in the future you must not register for a PopID account, and if you already have one, you must stop using and deactivate your PopID Account prior to the deadline stated. If you register for a PopID account, or continuing using the Service, and consent at this time, you can still avoid the transfer of your Biometric Vault Data to any third party selected by PopID by deactivating your PopID account prior to the date PopID identifies for when the transfers will begin.

WHERE WE STORE YOUR PERSONAL INFORMATION

All information you provide to us is stored on our secure servers in the United States. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

HOW YOU CAN ACCESS OR CHANGE YOUR PERSONAL INFORMATION

You can review and update your personal information in your Account settings at any time by logging in to your Account or by sending an email to support@popid.com.

HOW LONG WE RETAIN AND USE YOUR PERSONAL INFORMATION

We determine the date to destroy your Biometric Information based on the following criteria: except as provided, we will delete your Biometric Data on the earlier date of the following: (a) three years from the last date of your use of the Site; (b) within the time provided under applicable

law, following our agreement to comply with you request to delete your Biometric Information, when applicable law provides you with a right to make such a request, or (c) when it is no longer reasonably necessary for one or more of the purposes disclosed for our collecting, storing, and using your Biometric Information. Notwithstanding these criteria, we reserve the right to retain your Biometric Data for so long as it is reasonably necessary to (i) to complete your transactions, including the period allowed for any chargebacks or returns, (ii) to help ensure security and integrity of our Site, including preventing individuals from committing fraud or other illegal conduct, (iii) to debug to identify and repair errors that impair existing intended functionality of the Site, (iv) for internal uses that are compatible with reasonable consumer expectations or the context in which the information was provided, (v) to comply with a legal obligation, exercise legal claims or rights, or defend legal claims, or (vi) any other exception provided under applicable law, including California Civil Code sections 1798.105(d) and 1798.145.

Additionally, to continually enhance our technology-based system and support our ongoing efforts to improve the performance of the Service, to combat fraud, illegal activity, and other abuse or misuse of our Service, we may temporarily store images taken by PopPay and PopID devices.

LINKS TO OTHER SERVICES OR SITES

The Service may contain links to (or allow you to link to) other third-party services or websites. PopPay does not control the information collection of third-party services or websites that can be reached through such links. We encourage our users to be aware when they are linking to a third-party service or website and to read the privacy statements of any third-party service or website that collects personally identifiable information. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or their collection or use of Personal Information.

CHANGES TO OUR PRIVACY POLICY

PopID is always improving. As the Service evolve, we may occasionally update this privacy policy. If we modify this privacy policy, we will post the revised privacy policy to the website, and we will also revise the "last updated date" stated above.

We may update this Privacy Policy from time to time. In the event we make any material changes to this Privacy Policy, we will notify you by posting the revised policy on our corporate website (www.popid.com). When we update this Privacy Policy, we will note the date the most recent revision was posted below, at the end of the policy. Any revisions will become effective upon immediately upon posting on our corporate websites. It is your responsibility to periodically review the Privacy Policy posted on the website. Your use of the Site, including PopPay, after the posting on the updated Privacy Policy constitutes your agreement to the terms of the updated Privacy Policy.

HOW TO CONTACT US

If you have questions or concerns regarding this privacy policy, or any feedback pertaining to your privacy and the Service that you would like us to consider, please email us at privacy@popid.com, log into your account and use the Contact Us form, call us at (626) 639-0559, or write to us at PopID, Inc., Attn: Legal Department, 6800 Owensmouth Avenue, Suite 350, Canoga Park, CA 91303.

CONSUMER PRIVACY NOTICE

PopPay is a service provided by PopID, Inc.

Facts	What does PopID do with your personal information?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law and certain state laws also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security number and account balances; • Payment history, transaction history and account balances; • Credit history or credit scores; • Photographs, biometric information, and biometric vectors; <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>
How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons PopID chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does PopID share?	Can you limit this sharing?
For our everyday business purposes —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No

Reasons we can share your personal information	Does PopID share?	Can you limit this sharing?
For our marketing purposes —to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes —information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes —information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

Who we are	
Who is providing this Privacy Policy?	This privacy notice is provided by PopID, in connection with its provision of its services including PopPay, and is applicable to your personal PopID and PopPay accounts, and your use of the PopID and PopPay services.

What we do	
How does PopID protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law and PCI-DSS. These measures include computer safeguards and secured files and buildings.
How does PopID collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • open an account or provide account information • use one of our kiosks, POSs, PayPads, or other terminals • link your credit or debit card to your PopID account or give us your contact information • use your PopID account to send or receive funds <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>

What we do

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes— information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more information on your rights under state law.

Other important information

We may transfer personal information to other countries, for example, for customer service or to process transactions.

California: If your PopID account has a California mailing address, we will not share personal information we collect about you except to the extent permitted under California law. See the California Consumer Privacy Notice below.

Vermont: If your PopID account has a Vermont mailing address, we will not share personal information we collect about you with non-affiliates unless the law allows or you provide authorization.

*****CALIFORNIA CONSUMER PRIVACY ACT NOTICE -- NOTICE AT COLLECTION**

In this notice, we are addressing specific disclosure requirements under the California Consumer Privacy Act (CCPA) (Cal. Civ. Code § 1798.100, et seq.), and the California Consumer Privacy Act Regulations (CCPA Regulations) (11 CCR § 7000, et seq.) for California residents even though the CCPA and the CCPA Regulations do not currently apply to us. Although PopID does not currently meet the definition of a “business” as defined in the CCPA (Civil Code § 1798.140(d)), and is therefore a “nonbusiness,” as defined in 11 CCR § 7001(p), PopID endeavors to implement best practices, including those provided in the CCPA and the CCPA Regulations.

This notice should be read together with PopID’s Privacy Policy and applies to all California residents who visit our Sites or use the Service. Capitalized terms have the meaning given in the Privacy Policy. Terms in ALL CAPS have the meanings given to them in the CCPA, including Cal. Civil Code § 1798.140, and the CCPA Regulations, including 11 Cal. Code Reg. § 7001.

All references in this notice regarding rights you may have under the CCPA and CCPA Regulations will only apply to California residents if and when we meet the definition of BUSINESS as defined in the CCPA (Civil Code § 1798.140(d).) Until that point in time, however, we will use commercially reasonable efforts to provide the rights described in this notice, but are not legally obligated to do so.

Personal Information Collection and Purposes of Use

We COLLECT and USE PERSONAL INFORMATION, including Biometric Information, regarding California residents, including Biometric Information, as described in this notice (pages 12-25) and the above Privacy Policy, including the section titled “**THE INFORMATION WE COLLECT**” (page 2). Biometric Information that we COLLECT and USE from California residents constitutes SENSITIVE PERSONAL INFORMATION as that term is defined in California Civil Code section 1798.140(ae).

One type of “Personal Information” you share with us the details regarding your bank account from your financial institution (“Open Banking Data”) when you enroll your bank account as a Payment Method. When you add your bank account a Payment Method through Plaid (or a similar service we use), you agree to Plaid (or similar entity) establishing a connection between your bank account and us so that we may obtain Open Banking Data regarding your account as long as you maintain that bank account as a Payment Method. We use the Open Banking Data you share with us to make decisions regarding you and your PopID Account, including whether or not to approve transactions you attempt to make, establishing and adjusting limits on your account and transaction, as well as for us to decide, in our sole and absolute discretion, to offer or provide you with interest free, cash flow advances.

Sensitive Personal Information Collection and Use

We collect and use your SENSITIVE PERSONAL INFORMATION, including Biometric Information, only the purposes stated below, and not for the purpose of inferring characteristics about you.

We only use or disclose the SENSITIVE PERSONAL INFORMATION, including Biometric Information, as follows:

- (a) To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services;
- (b) To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information;
- (c) To resist malicious, deceptive, fraudulent, or illegal actions directed at PopID and to prosecute those responsible for those actions.
- (d) To ensure the physical safety of natural persons.
- (e) For short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of a consumer's current interaction with PopID, and we do not as part of this process (i) use that SENSITIVE PERSONAL INFORMATION to build a profile about you, or (2) disclose this SENSITIVE PERSONAL INFORMATION to another THIRD PARTY.
- (f) To perform services on behalf of PopID.
- (g) To verify or maintain the quality or safety of a product, service, or device that is owned, manufactured, manufactured for, or controlled by PopID, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by PopID.
- (h) To collect or process SENSITIVE PERSONAL INFORMATION where the collection or processing is not for the purpose of inferring characteristics about a consumer.

Because our collection and use of your SENSITIVE PERSONAL INFORMATION is already limited to what is allowed following a REQUEST TO LIMIT the collection and use of your SENSITIVE PERSONAL INFORMATION (i.e. what is permitted by California Civil Code

section 1798.121(a), and CCPA Regulations section 7027(m)), you do not have a right to request to limit our collection and use of your SENSITIVE PERSONAL INFORMATION.

We do not SELL PERSONAL INFORMATION to THIRD PARTIES

We do not SELL PERSONAL INFORMATION, including Biometric Information, of any of our users, including California residents, to THIRD PARTIES as those terms are defined in the CCPA and CCPA Regulations. We did not SELL any PERSONAL INFORMATION, including Biometric Information, of any California residents to any THIRD PARTY in the preceding 12 months.

SELL is defined by the CCPA as “selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to a third party for monetary or other valuable consideration.”

THIRD PARTY is defined by the CCPA as “a person who is not any of the following: (1) The business with whom the consumer intentionally interacts and that collects personal information from the consumer as part of the consumer’s current interaction with the business under this title,” “(2) A service provider to the business,” or “(3) A contractor.”

We do not SHARE PERSONAL INFORMATION with THIRD PARTIES

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SHARE is defined by the CCPA as “sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged.” (Cal. Civ. Code § 1798.140(ah).

Because our collection and use of your SENSITIVE PERSONAL INFORMATION is already limited to what is allowed following a REQUEST TO LIMIT the collection and use of your SENSITIVE PERSONAL INFORMATION (i.e. what is permitted by California Civil Code section 1798.121(a), and CCPA Regulations section 7027(m)), you do not have a right to request to limit our collection and use of your SENSITIVE PERSONAL INFORMATION.

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California Residents' CCPA Rights – How to Make Requests to Exercise Rights

When the CCPA applies, California residents have the right to:

- (a) request information (RIGHT TO KNOW) about the PERSONAL INFORMATION we have COLLECTED, SOLD, or SHARED about them;
- (b) request the correction (RIGHT TO CORRECT) inaccurate personal information we maintain about them; and
- (c) request the deletion (RIGHT TO DELETE) of PERSONAL INFORMATION collected from them, with certain exceptions.

To exercise any of these rights, you or your authorized agent may contact us at privacy@popid.com or by logging into your account and use the Contact Us form. We may require you to provide additional personal information to verify your identity before we process your request. We may not process your request if we are unable to verify your identity.

California Privacy Rights Act Non-Discrimination Notice.

We will not discriminate against any consumer for exercising their rights under the California Privacy Rights Act.

California Residents' CCPA Rights – How to Make Requests to Exercise Rights

When the CCPA applies, California residents have the right to:

- (a) request information (RIGHT TO KNOW) about the PERSONAL INFORMATION we have COLLECTED, SOLD, or SHARED about them;
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- (c) request the deletion (RIGHT TO DELETE) of PERSONAL INFORMATION collected from them, with certain exceptions.

To exercise any of these rights, you or your authorized agent may contact us at privacy@popid.com or by logging into your account and using the Contact Us form. We may require you to provide additional personal information to verify your identity before we process your request. We may not process your request if we are unable to verify your identity.

California Privacy Rights Act Non-Discrimination Notice.

We will not discriminate against any consumer for exercising their rights under the California Privacy Rights Act.

<p>In the preceding 12 months, we have collected the following categories of PERSONAL INFORMATION from California Residents:</p>	<p>We have collected such PERSONAL INFORMATION from the following categories of sources:</p>	<p>We collected such PERSONAL INFORMATION to use for the following purposes:</p>	<p>In the preceding 12 months, we SOLD or SHARED such PERSONAL INFORMATION to, or with, the FOLLOWING categories of THIRD PARTIES (with the definitions of ALL CAPS terms provided by the CCPA):</p>	<p>In the preceding 12 months, we shared (as the word is commonly understood) such PERSONAL INFORMATION with the following categories of third parties (as the term is commonly understood):</p>
<p>a. Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.</p>	<ul style="list-style-type: none"> • from you when you use our Service • merchants • service providers • financial institutions 	<ul style="list-style-type: none"> • provide the Service and customer support • process transactions and send notices about your transactions or your network activity • resolve disputes, collect fees, and troubleshoot problems • prevent potentially fraudulent, prohibited, or illegal activities, and enforce our User Agreement 	<ul style="list-style-type: none"> • NONE 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers • financial institutions • merchants • third party accounts or platforms • parties to the transaction • other PopID users • internet users (some personal information is public information)

<p>In the preceding 12 months, we have collected the following categories of PERSONAL INFORMATION from California Residents:</p>	<p>We have collected such PERSONAL INFORMATION from the following categories of sources:</p>	<p>We collected such PERSONAL INFORMATION to use for the following purposes:</p>	<p>In the preceding 12 months, we SOLD or SHARED such PERSONAL INFORMATION to, or with, the FOLLOWING categories of THIRD PARTIES (with the definitions of ALL CAPS terms provided by the CCPA):</p>	<p>In the preceding 12 months, we shared (as the word is commonly understood) such PERSONAL INFORMATION with the following categories of third parties (as the term is commonly understood):</p>
		<ul style="list-style-type: none"> • create an account connection between your PopID account and a third-party account or platform • customize, personalize, measure, and improve our services and the content and layout of our website • send you updates about new products and services that we are offering to customers • compare information for accuracy and verify it with third parties • perform other duties as required by law 		<p>including your PopID username, PopID profile photo, PopID profile first and last name, month, and year of PopID account creation, and public transactions in which you've been involved, and may be seen by anyone on the internet, whether or not they have a PopID account)</p> <ul style="list-style-type: none"> • third parties for our business purposes or as permitted or required by law • law enforcement, government officials, or other third parties
<p>b. Any categories of personal information described in subdivision (e) of</p>	<ul style="list-style-type: none"> • from you when you use our Service • merchants 	<ul style="list-style-type: none"> • provide the Service and customer support 	<ul style="list-style-type: none"> • NONE 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls

<p>In the preceding 12 months, we have collected the following categories of PERSONAL INFORMATION from California Residents:</p>	<p>We have collected such PERSONAL INFORMATION from the following categories of sources:</p>	<p>We collected such PERSONAL INFORMATION to use for the following purposes:</p>	<p>In the preceding 12 months, we SOLD or SHARED such PERSONAL INFORMATION to, or with, the FOLLOWING categories of THIRD PARTIES (with the definitions of ALL CAPS terms provided by the CCPA):</p>	<p>In the preceding 12 months, we shared (as the word is commonly understood) such PERSONAL INFORMATION with the following categories of third parties (as the term is commonly understood):</p>
<p>Section 1798.80: “Personal information” means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial</p>	<ul style="list-style-type: none"> • service providers • financial institutions 	<ul style="list-style-type: none"> • process transactions and send notices about your transactions or your network activity • resolve disputes, collect fees, and troubleshoot problems • prevent potentially fraudulent, prohibited, or illegal activities, and enforce our User Agreement • create an account connection between your PopID account and a third-party account or platform • customize, personalize, measure, and improve our services and the content and layout of our website • send you updates about new products and services that we 		<ul style="list-style-type: none"> • service providers as permitted by law • financial institutions as permitted by law • merchants • third party accounts or platforms that you authorize • parties to the transaction • other PopID users • certain internet users (some personal information is public information including your PopID username, PopID profile photo, PopID profile first and last name, month, and year of PopID account creation, and public transactions in which you’ve been involved (if any), and

<p>In the preceding 12 months, we have collected the following categories of PERSONAL INFORMATION from California Residents:</p>	<p>We have collected such PERSONAL INFORMATION from the following categories of sources:</p>	<p>We collected such PERSONAL INFORMATION to use for the following purposes:</p>	<p>In the preceding 12 months, we SOLD or SHARED such PERSONAL INFORMATION to, or with, the FOLLOWING categories of THIRD PARTIES (with the definitions of ALL CAPS terms provided by the CCPA):</p>	<p>In the preceding 12 months, we shared (as the word is commonly understood) such PERSONAL INFORMATION with the following categories of third parties (as the term is commonly understood):</p>
<p>information, medical information, or health insurance information. “Personal information” does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.</p>		<p>are offering to customers</p> <ul style="list-style-type: none"> • compare information for accuracy and verify it with third parties • perform other duties as required by law 		<p>may be seen by anyone on the internet, whether or not they have a PopID account);</p> <ul style="list-style-type: none"> • third parties for our business purposes or as permitted or required by law • law enforcement, government officials, or other third parties
<p>c. Any categories of SENSITIVE PERSONAL INFORMATION, as defined in California Civil Code section 1798.135(ae), including Biometric Information.</p>	<ul style="list-style-type: none"> • from you when you use our Service, including during registration, when logging into your account, and making a transaction, • as you otherwise provide to us 	<ul style="list-style-type: none"> • provide the Service and customer support • process transactions and send notices about your transactions or your network activity • resolve disputes, collect fees, and troubleshoot problems • prevent potentially fraudulent, 	<p>NONE</p>	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers as permitted by law • financial institutions as permitted by law • third parties for our business purposes as permitted or required by law

<p>In the preceding 12 months, we have collected the following categories of PERSONAL INFORMATION from California Residents:</p>	<p>We have collected such PERSONAL INFORMATION from the following categories of sources:</p>	<p>We collected such PERSONAL INFORMATION to use for the following purposes:</p>	<p>In the preceding 12 months, we SOLD or SHARED such PERSONAL INFORMATION to, or with, the FOLLOWING categories of THIRD PARTIES (with the definitions of ALL CAPS terms provided by the CCPA):</p>	<p>In the preceding 12 months, we shared (as the word is commonly understood) such PERSONAL INFORMATION with the following categories of third parties (as the term is commonly understood):</p>
		<p>prohibited, or illegal activities, and enforce our User Agreement</p> <ul style="list-style-type: none"> • create an account connection between your PopID account and a third-party account or platform • customize, personalize, measure, and improve our services and the content and layout of our website • send you updates about new products and services that we are offering to customers • compare information for accuracy and verify it with third parties • perform other duties as required by law 		<ul style="list-style-type: none"> • law enforcement, government officials, or other third parties as permitted or required by law.

<p>In the preceding 12 months, we have collected the following categories of PERSONAL INFORMATION from California Residents:</p>	<p>We have collected such PERSONAL INFORMATION from the following categories of sources:</p>	<p>We collected such PERSONAL INFORMATION to use for the following purposes:</p>	<p>In the preceding 12 months, we SOLD or SHARED such PERSONAL INFORMATION to, or with, the FOLLOWING categories of THIRD PARTIES (with the definitions of ALL CAPS terms provided by the CCPA):</p>	<p>In the preceding 12 months, we shared (as the word is commonly understood) such PERSONAL INFORMATION with the following categories of third parties (as the term is commonly understood):</p>
<p>d. Characteristics of protected classifications under California or federal law.</p>	<ul style="list-style-type: none"> • from you when you use our Service • service providers 	<ul style="list-style-type: none"> • provide the Service • prevent potentially fraudulent, prohibited, or illegal activities, and enforce our User Agreement • send you updates about new products and services that we are offering to customers • compare information for accuracy and verify it with third parties • perform other duties as required by law 	<ul style="list-style-type: none"> • NONE 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers as permitted by law • financial institutions as permitted by law • third parties for our business purposes or as permitted or required by law; • law enforcement, government officials, or other third parties only as permitted or required by law.
<p>e. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or</p>	<ul style="list-style-type: none"> • from you when you use our Service • merchants • service providers • financial institution 	<ul style="list-style-type: none"> • provide the Service and customer support • process transactions and send notices about your transactions or your network activity 	<ul style="list-style-type: none"> • NONE 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers • financial institutions • merchants

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<p>consuming histories or tendencies.</p>		<ul style="list-style-type: none"> • resolve disputes, collect fees, and troubleshoot problems • prevent potentially fraudulent, prohibited, or illegal activities, and enforce our User Agreement • create an account connection between your PopID account and a third-party account or platform • customize, personalize, measure, and improve our services and the content and layout of our website • send you updates about new products and services that we are offering to customers • compare information for 		<ul style="list-style-type: none"> • third party accounts or platforms • parties to the transaction • other PopID users • internet users (some personal information is public information including your PopID username, PopID profile photo, PopID profile first and last name, month, and year of PopID account creation, and public transactions in which you've been involved, and may be seen by anyone on the internet, whether or not they have a PopID account) • third parties for our business purposes or as

<p>In the preceding 12 months, we have collected the following categories of PERSONAL INFORMATION from California Residents:</p>	<p>We have collected such PERSONAL INFORMATION from the following categories of sources:</p>	<p>We collected such PERSONAL INFORMATION to use for the following purposes:</p>	<p>In the preceding 12 months, we SOLD or SHARED such PERSONAL INFORMATION to, or with, the FOLLOWING categories of THIRD PARTIES (with the definitions of ALL CAPS terms provided by the CCPA):</p>	<p>In the preceding 12 months, we shared (as the word is commonly understood) such PERSONAL INFORMATION with the following categories of third parties (as the term is commonly understood):</p>
		<p>accuracy and verify it with third parties</p> <ul style="list-style-type: none"> perform other duties as required by law 		<p>permitted or required by law</p> <ul style="list-style-type: none"> law enforcement, government officials, or other third parties only as permitted or required by law.
<p>f. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.</p>	<ul style="list-style-type: none"> from you when you use our Service merchants service providers 	<ul style="list-style-type: none"> provide the Service and customer support process transactions and send notices about your transactions or your network activity resolve disputes, collect fees, and troubleshoot problems prevent potentially fraudulent, prohibited, or illegal activities, and enforce our User Agreement create an account connection between 	<p>NONE</p>	<ul style="list-style-type: none"> PopID and affiliates and subsidiaries it controls service providers financial institutions third party accounts or platforms third parties for our business purposes or as permitted or required by law law enforcement, government officials, or other third parties

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		<p>your PopID account and a third-party account or platform</p> <ul style="list-style-type: none"> • customize, personalize, measure, and improve our services and the content and layout of our website • send you updates about new products and services that we are offering to customers • compare information for accuracy and verify it with third parties • perform other duties as required by law 		<p>only as permitted or required by law.</p>
<p>g. Geolocation data.</p>	<ul style="list-style-type: none"> • from you if you elect to share this information • service providers 	<ul style="list-style-type: none"> • to enhance the security of the Service, provide you with location-specific options, functionality, offers, advertising, search results, or other 	<ul style="list-style-type: none"> • NONE 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers • third parties for our business

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		<p>location-specific content</p> <ul style="list-style-type: none"> • prevent potentially fraudulent, prohibited, or illegal activities, and enforce our User Agreement 		<p>purposes or as permitted or required by law</p> <ul style="list-style-type: none"> • law enforcement, government officials, or other third parties as permitted or required by law.
<p>h. Audio, electronic, visual, thermal, olfactory, or similar information.</p>	<ul style="list-style-type: none"> • from you when you use our Services 	<ul style="list-style-type: none"> • provide the Service and customer support • process transactions • resolve disputes, collect fees, and troubleshoot problems • prevent potentially fraudulent, prohibited, or illegal activities, and enforce our User Agreement • compare information for accuracy and verify it with third parties 	<ul style="list-style-type: none"> • NONE 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers • third parties for our business purposes or as permitted or required by law • law enforcement, government officials, or other third parties only as permitted or required by law.

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		<ul style="list-style-type: none"> • perform other duties as required by law 		
<p>i. Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitude.</p>	<ul style="list-style-type: none"> • from you when you use our Service • merchants • service providers 	<ul style="list-style-type: none"> • provide the Service • prevent potentially fraudulent, prohibited, or illegal activities, and enforce our User Agreement • customize, personalize, measure, and improve our services and the content and layout of our website • send you updates about new products and services that we are offering to customers • perform other duties as required by law 	<ul style="list-style-type: none"> • NONE 	<ul style="list-style-type: none"> • PopID and affiliates and subsidiaries it controls • service providers • third parties for our business purposes or as permitted or required by law • law enforcement, government officials, or other third parties only as permitted or required by law.

CONSENT TO POPID’S VAULTING OF BIOMETRIC DATA WITH THIRD PARTY

As part of our efforts to continuously improve and enhance the Service, in the future, we may transfer all user’s registration image(s), along with certain personal information collected from each user including your First Name, Last Name, phone number, email address, and a unique identification number (“Biometric Vault Data”), to a third party, selected in our sole discretion, to vault this data for us. By registering for a PopID account, or using the Service, your expressly consent to us electing at some point in the future, to vault the Biometric Vault Data collected from you, including your registration image(s), with a third party, selected in our sole discretion, without obtaining further consent from you.

Prior to us transferring the Biometric Vault Data, we will provide you notice regarding the transfer and the date they will begin. However, you agree that we will not need to obtain further consent from you to proceed with the transfer of the Biometric Vault Data to the third party we select.

If you do not consent to PopID’s right to transfer the Biometric Vault Data collected from you, including your registration image(s), to a third party in the future you must not register for a PopID account, and if you already have one, you must stop using and deactivate your PopID Account prior to the deadline stated. If you register for a PopID account, or continuing using the Service, and consent at this time, you can still avoid the transfer of your Biometric Vault Data to any third party selected by PopID by deactivating your PopID account prior to the date PopID identifies for when the transfers will begin.

NOTICE FOR RESIDENTS OF STATES WITH THE SAME OR SUBSTANTIALLY SIMILAR LAWS AS THE CCPA

If you are a resident of a state that has adopted its own version of California’s Consumer Privacy Act, or a substantially similar law, then the CCPA Notice applies to residents of those states who visit our Sites or use the Service and should be read together with the Privacy Policy Above.

GDPR NOTICE -- YOUR RIGHTS UNDER THE GDPR

The GDPR does not generally provide rights to residents of the United States. If, however, the GDPR provides rights to you, then this section applies to you.

For purposes of this section, “Data Protection Laws” means any Applicable Law relating to the processing, privacy, and use of Personal Data, including (a) California Consumer Privacy Act (CCPA) for California residents, (b) in the United Kingdom, (i) the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, SI 2003/2426, and any laws or regulations implementing Directive 95/46/EC (Data Protection Directive) or Directive 2002/58/EC (ePrivacy Directive); and/or (ii) the General Data Protection Regulation (EU) 2016/679 (GDPR), and/or any corresponding or equivalent national laws or regulations (Revised UK DP Law) (c) in member states of the European Union, the Data Protection Directive or the GDPR, once applicable, and the ePrivacy Directive, and all relevant member state laws or regulations giving effect to or corresponding with any of them; and (d) any judicial or administrative interpretation of any of the above, any guidance, guidelines, codes of practice,

approved codes of conduct or approved certification mechanisms issued by any relevant Supervisory Authority;

For this Section, “Personal Data” means any information relating to an identified or identifiable natural person (“Data Subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person and where referred to in this policy includes special categories of Personal Data.

Under certain circumstances, you have the right to:

- Request access to your Personal Data (commonly known as a “subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data in certain circumstances.
- Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your Personal Data to another party.
- If you want to review, verify, correct, or request erasure of your Personal Data, object to the processing of your Personal Data, or request that we transfer a copy of your Personal Data to another party, please contact us as indicated in the Contact section of this Policy.

To exercise any of the above rights, you can contact PopID using the information in the Contact Us section above. You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.