

Privacy Policy *

Effective Date: March 23, 2022

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Your privacy is important to us. This Privacy Policy describes the information Givebacks, Inc. (“Givebacks,” “we,” “us,”) collects in connection with our Services, how Givebacks processes it, and for what purposes.

The personal information we collect, and the purposes for which we process it, depend on the context of your interactions with us and the Services you use. When we refer to the “Services” in this Privacy Policy, we mean both our Websites and our Offerings:

- “Websites” means www.givebacks.com and any other websites we operate and that include a link to this Privacy Policy.
- “Offerings” means individual products and services that we make available to individuals and organizations that sign up for an account with us, or with whom we otherwise enter into an agreement to provide those products and services. Offerings include our cloud-based software applications, mobile applications, browser extensions, shopping rewards and card-linked offer programs, and any other products or services that we make available and that include a link to this Privacy Policy.

The Offering-Specific Details section of this Privacy Policy provides additional relevant information about how we collect, use, and disclose personal information as part of our provision of certain Offerings.

By using the Services, you acknowledge that you have read this Privacy Policy. If you do not agree to the handling of your personal Information as described in this Privacy Policy, please do not use the Services or provide your personal Information to us.

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The Information We Collect and How We Collect It

The information we collect and the sources from which we collect it depend on the context of your interactions with us, the choices you make, and the Services and features you use. This section generally describes the information we collect through the Services and how we collect it. For additional details regarding the information collected through specific Offerings, please see the Offering-Specific Details section of this Privacy Policy

Information You Provide to Us Directly

You may choose to provide certain information to us when you use the Services. The categories of information we generally collect through this method are summarized below.

- **Contact Information**

We collect personal information that you submit to us through contact forms that we make available through the Services, including to enable you to inquire about the Services and to request support for your use of the Services. This information may include personal information such as your name, your email address, your mailing address, your telephone number, and any other information you submit as part of your inquiry or request.

If you represent or are part of a cause or an organization that uses our Services, the information you provide may also include the name and contact information for your organization and your role in the organization.

- **Account Information**

When you register to create an account to use the Services, we will ask you to provide your email address and create a password to access your account, and may ask you to provide other contact and demographic information such as your name, your mailing address, and your date of birth.

We may also ask you to select a cause or organization to benefit from your use of the Services, and may collect information you submit to search for and select a cause, which may include the city, zip code, and/or cause and organization name.

- **Financial and Payment Account Information**

If you use the Services to make purchases from, or donations to, causes or organizations, we will collect your payment and billing information, which may include information such as your payment card number, expiration date, and security code.

If you use the Services to earn and redeem cashback and other rewards, we will also collect information associated with your chosen payment method, which may include your bank account number and routing information, or your account credentials for your online payment service provider.

- **Cause and Organization Information**

If you use the Services on behalf of a cause or organization, we may ask you to set up an administrator or other organization account. The information we collect to set up your cause or organization account may also include your contact details such as your name, email address, and telephone number; the name and address of your cause or organization and a description of your cause or organization's products and services; and your cause or organization's payment account details to facilitate the collection and receipt of payments associated with transactions made through the Services.

- **Applicant Information**

The Services may allow you to apply for employment with Givebacks by filling out an application form and uploading your resume. The information we collect through this method may include your name, email address, telephone number, mailing address, a link to your social media profile(s), information about your experience and why you are interested in working with us, information about your ability to legally work in the United States, and any information contained in the resume, cover letter, or additional files that you upload and submit to us.

We use this information to evaluate your qualifications and other related recruiting and hiring purposes.

Information We Collect Automatically

We collect certain information automatically when you use the Services, which may include information set out in the categories below. We collect some of this information through tracking technologies such as cookies and web beacons. For more information, please see the **How We Use Cookies and Other Tracking Technologies** section of this Privacy Policy.

- **Device and Other Technical Information**

When you use the Services we may automatically collect information about the computer, device, hardware, or software you use to access the Services, such as your Internet Protocol (“IP”) address or other transactional or identifier information for your device (such as device make and model, information about device operating systems and browsers, or other device or system-related specifications), and, when you launch any of our Services from a mobile device, the unique device ID for your mobile device.

We may also collect information and statistics about your interaction with the Services, which may include the URLs of the pages that you have visited, URLs of referring and exiting pages, page views, time spent on a page, number of clicks, the application you used, how long you used the application and when, and other similar usage statistics; and information that facilitates a safer and more personalized experience, such as user identification information, saved preferences, and device identifiers or usage information for authentication and fraud prevention purposes.

- **Shopping and Rewards Information.**

When you use the Services to shop for offers from our participating merchants, we will automatically collect information that may include the participating merchants, products, services, and offers you searched for, viewed, or clicked; the websites you visit and your browsing activity on those sites; and transaction information related to our Services, including purchase confirmation data and rewards accrued through the Services.

- **Location Information**

When you use the Services, we may collect information about your location from your device, including your approximate location derived from your IP address, as well as precise location information that is provided through the GPS and other functionality on devices you use to access the Services. We will use this location information to customize the Services, including offers that are shown to you when you use the Services.

Information We Receive from Third Parties

When you use the Services, we may also receive information about you from third parties with whom we work, which may include the categories of information set out below

- **Information We Receive from Participating Merchants and Other Business Partners**

When you use the Services to shop at participating merchants for goods and services, in addition to the information we may collect automatically through the Services, we may also receive information from those participating merchants and other business partners with whom we work to provide the Services, including the participating merchant name, transaction date, transaction amount, and other information relating to your shopping activity and purchases.

- **Information we Receive from Causes, Referral Partners and Other Users**

We may receive your personal information, including your name and email address, from causes and referral partners that we work with, as well as from other users of our Services, if they think you may be interested in our Services and/or invite you to participate.

- **Information We Receive from Third-Party Services You Use to Connect to our Services**

If you use an account that you have established on a third-party service such as Facebook or Apple to connect with or Services, we may receive certain information about that account from the third-party service, the nature and extent of which will depend on the privacy policies and settings for those third-party services.

- **Information We Collect from Social Media Networks**

If you choose to interact with us or our partners on social media by posting to our pages, tagging us (or using certain hashtags or other identifiers) in posts, or participating in activities, we may collect certain information from the social media account you use to interact with us, including the name associated with the account, the account handle, recent activity, the content of any posts in which we are tagged, and other information that may be contained on your social media profile to allow us to respond to the posts and understand and engage with our audience.

- **Information We Receive from Other Third-Party Sources**

In addition to the sources noted above, we may receive your name and other contact information from publicly-available and commercially-available sources such as government databases and data brokers. We may also receive information, such as device information and browsing information, from third parties for marketing and analytics purposes, for example to provide you with personalized ads on our Services and in third-party websites and mobile services.

De-Identified Information

We may collect, or use personal information we collect to create, De-Identified Information. “De-Identified Information” means information that is not reasonably linkable to you, and from which all direct and indirect identifiers, including names, ID numbers, dates of birth, demographic information, location information, and your school information, has been removed.

We will not attempt to re-identify De-Identified Information and we will not transfer De-Identified Information to any third party unless that party also agrees not to attempt to re-identify the information. Otherwise, we may use and disclose De-Identified Information for any lawful purpose, without restriction.

How We Use Your Information

We may use information that we collect about you or that you provide to us, including any personal information, for the following purposes:

- To operate and provide the Services to you, including to process your registration, maintain and manage your account, identify and make offers and rewards available to you, facilitate and manage purchase transactions, track and deliver rewards you have earned, and provide support for your account and use of the Services.
- To provide services to organizations and causes we work with, and to otherwise perform the terms of our agreements with them, including by issuing fundraising payments to them.
- To communicate with you, including in response to your inquiries, and to send you email newsletters, information about offers and other promotional content, and general information about the Services.
- To personalize the Services, including to create a profile of your preferences to personalize and tailor Services content so that it is more likely to be of interest to you, such as by providing personalized and/or more relevant offers from our participating merchants.
- To analyze and improve the effectiveness of the Services and our marketing efforts.
- To provide you with interest-based advertisements, push notifications, communications, and offers for products and services from us, our business partners, and participating merchants, including based on your precise geolocation.
- To perform analytics and conduct customer research.
- To comply with legal or regulatory requirements, judicial process, and our company policies (including due diligence and contracting activities).
- To secure the Services, including by protecting against and responding to fraud, illegal activity (such as incidents of hacking or misuse of the Services), and claims and other liabilities, including by enforcing our Terms of Use.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our business, assets or stock.
- For any other purpose that you may authorize or direct at the time we collect your information.

We may also use your personal information to create anonymous or aggregated information that does not and cannot be used to identify you, and use such information for any lawful purpose.

For additional details regarding how we use information collected through certain of our Offerings, please see the **Offering-Specific Details** section of this Privacy Policy.

How We Share Your Information

To accomplish the purposes set out above, we may disclose your personal information to third parties that may include:

- causes and organizations with whom you choose to share rewards that you earn through the Services or to whom you otherwise use the Services to donate funds;
- other users of the Services, if you submit reviews or comments on Givebacks offers to the Services;
- participating merchants, when you purchase or redeem an offer from them, or otherwise interact with them through our Services;

- affiliate partners with whom we work to provide offers to you;
- payment processing and other financial partners we work with to provide the Services and to facilitate your redemption of rewards earned through the Services;
- digital advertising providers that automatically collect Internet and Network Activity information about your use of the Services, such as your browsing history, IP address, pages viewed, and links clicked, so that they can use this information to serve you ads for our Services on other sites;
- contractors and service providers we use to support our business and the Services;
- a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our business, assets, or stock;
- third parties when, in our sole discretion, it is necessary to comply with any court order, law, or legal process, including to respond to any government or regulatory request, or to enforce or apply our terms of use and other agreements, including for billing and collection purposes;
- third parties to whom we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our clients, or others; and
- any other parties with your consent or at your direction, such as when you use any features we make available within the Services to share information about our offers and your purchases through social media platforms.

We may also disclose aggregated information about our users, and information that does not identify any individual, without restriction.

For additional details regarding our practices with respect to the sharing of information that we collect through certain Offerings, please see the **Offering-Specific Details** section of this Privacy Policy

How We Use Cookies and Other Tracking Technologies

We also collect information about your use of the Services through tracking technologies such as cookies and web beacons. A “cookie” is a unique numeric code that is transferred to your computer to track your interests and preferences and to recognize you as a return visitor. A “Web beacon” is a transparent graphic image placed on a website, email, or advertisement that enables the monitoring of things such as user activity and site traffic.

Some content or applications, including advertisements, on the Services are served by third parties, which may include advertisers, ad networks and servers, content providers, and analytics and application providers. These third parties may use cookies alone or along with web beacons or other tracking technologies to collect information about you when you use the Services. For instance, we use Google Analytics. Google Analytics uses cookies to help us analyze how visitors use the Service. For more information on Google Analytics, including how Google Analytics collects, uses and discloses information, please refer to the following page:

<https://policies.google.com/technologies/partner-sites>.

The information third parties collect through cookies and web beacons may be linked to your personal information, and they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

Use of Services by Children

Givebacks does not knowingly collect information from, or provide any of our Services to, children under the age of 16. Nor do we target our Services to children under these ages.

IF YOU ARE UNDER 16 YEARS OF AGE, THEN PLEASE DO NOT USE OR ACCESS THE SERVICES AT ANY TIME OR IN ANY MANNER.

If you are the parent or legal guardian of a child under 13 who has used the Services and provided personal information to us in violation of this policy, then please contact us at support@givebacks.com to have that child's information deleted.

Your Choices Regarding Your Information

We provide you with choices regarding your personal information.

- You can browse our websites without registering or directly submitting any information to us. You can also choose not to provide your personal information to us directly. If, however, you choose not to provide personal information that we request as part of providing the Services to you, you may be unable to access or use features of the Services, and we may still collect some limited information automatically, as described above.
- You may opt out of receiving our email messages by using the unsubscribe links provided in those messages. You can also manage your communications preferences on your account profile page.
- If you have created an account, you may review, update, or delete certain personal information associated with your account by logging into your account on the Services.
- You can accept or decline cookies. The Services do not currently respond to browser "do not track" signals, so you will need to use your browser settings to effectively manage cookies. You can set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. If you disable or refuse cookies, you may find that certain features or functions will not work as intended.
- For information about interest-based advertising, and to opt out of this type of advertising by third parties that participate in self-regulatory programs, please visit the Network Advertising Initiative (NAI) opt out tool (<http://www.networkadvertising.org/choices/>) and/or the Digital Advertising Alliance (DAA) Self-Regulatory Program for Online Behavioral Advertising (<https://youradchoices.com/>). Please note that any opt-out choice you exercise through these programs will apply to interest-based advertising by the third parties you select, but will still allow the collection of data for other purposes, including research, analytics, and internal operations. You may continue to receive advertising, but that advertising may be less relevant to your interests.
- You may manage whether and how your mobile device and mobile browser share precise location data with us, as well as how your mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings. Please note, however, that even if you disable location sharing on your mobile device, we may still collect other location-related information that your device makes available.

Links to Other Websites; Third Party Services

Our Services may contain links to other websites and online services. If you choose to click on an advertisement or another third-party link within the Services, such as to a participating merchant, you may be directed to that third party's website or service. The fact that we link to a third-party website or service is not an endorsement or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third-party websites or services. These other websites or services may place their own cookies or other files on your computer or mobile devices, collect data or solicit personal information from you. Other websites and services follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies or statements of the other websites and services you use.

Other third parties with whom we work to provide the Services, including networks we work with to provide offers and participating merchants, also have their own Privacy Policies that apply to personal information we share with them in connection with our operation of the Services. We encourage you to familiarize yourself with the Privacy Policies provided by these other parties prior to providing them with information.

To that end, we use PayPal's Hyperwallet service to facilitate the redemption of rewards and remittances of funds to our users and causes and organizations. The Hyperwallet Privacy Policy, available at <https://www.hyperwallet.com/privacy-policy/> applies to PayPal's handling of personal information it collects through the operation of the Hyperwallet Service. You may exercise any rights that you may have with respect to personal information received by Hyperwallet according to the instructions set out in the Hyperwallet Privacy Policy.

International Users

If you are located outside the United States and choose to provide personal information to us, we transfer personal information to and process it in the United States. Your use of the Services and submission of personal information to us represents your agreement to that transfer.

Additional Information for Residents of California

This section applies only to residents of the State of California and generally describes how we collect, use, and disclose the personal information of California residents and their households ("California Personal Information"). However, California Personal Information does not include, and this section does not apply to other personal information excluded or excepted from requirements of the California Consumer Privacy Act of 2018 ("CCPA").

Additionally, this section applies only to the extent we direct the purposes and means of California Personal Information processing and otherwise qualify as a "business" that is subject to the CCPA.

California Personal Information We Collect

We may collect, and may have collected in the preceding 12 months, the following categories of California Personal Information, as described in more detail above in **The Information We Collect and How We Collect It** section of this Privacy Policy:

- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as name, address, telephone number, state identification card number, bank account number, credit card number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories.

- Identifiers such as your real name, alias, postal address, zip code, telephone number, email address, account name, payment card numbers, or other similar identifiers.
- Unique and online identifiers such as device identifiers, internet protocol addresses, cookie identifiers, beacon identifiers, pixel tags or mobile ad identifiers or similar technology, or other forms of persistent or probabilistic identifiers that can be used to identify a particular consumer or device.
- Commercial information that identifies or could reasonably be linked to you, such as products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Internet or other electronic network activity information identifies or could reasonably be linked to you, such as browsing history, search history and information regarding your interaction with an internet website, application, or advertisement.
- Geolocation information, such as your specific, real-time physical location or precise movements while you access our sites or apps if you have enabled location services on your device.
- Protected classification characteristics under California or federal law, which includes age if 40 years or older, race, color, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, pregnancy or childbirth and related medical conditions), veteran or military status, genetic information (including familial genetic information), to the extent you provide this information to us.
- Inferences drawn from personal information, such as person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.
- Sensitive personal information as defined by applicable law:
 - Precise geolocation
 - Personal information that reveals a consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.

Retention of personal information

We will retain the California Personal Information we collect and process for as long as required to satisfy the purpose for which it is collected and used (for example, for the time necessary for us to provide the Services, provide you with customer service, answer your queries, or resolve technical problems), unless a longer period is required or permitted by law, such as to fulfill our legal obligations or to establish, protect or defend legal claims.

Sources of California Personal Information We Collect

We collect California Personal Information from the following categories of sources:

- Directly from you. For example, when you submit information to us through forms included on the Websites and within our Offerings.
- Automatically and indirectly from you, such as through logging and analytics tools, cookies, pixel tags, and other automatic data collection.
- From third parties, such as merchants and other business partners, organizations and causes that use our Services, and other users of our Offerings.

Purposes for Which We Use California Personal Information

We may collect and use the categories of California Personal Information described in the **California Personal Information We Collect** section above for one or more of the business and commercial purposes described in the **How We Use Your Information** section above.

Disclosures of California Personal Information for a Business Purpose

We may disclose the categories of California Personal Information that we collect as indicated above to the categories of third parties described in the **How We Share Your Information** section of this Privacy Policy. In the preceding 12 months, we may have disclosed the categories of California Personal Information that we collected, as described above, for a business purpose to the categories of third parties listed in the **How We Share Your Information** section of this Privacy Policy.

Sales and Sharing of California Personal Information

The CCPA regulates the disclosure of California Personal Information in exchange for monetary or other valuable consideration (which the CCPA defines as the “sale” of California Personal Information), as well as the “sharing” of California Personal Information for targeted or cross-context behavioral advertising. Under the CCPA, our disclosure of California Personal Information to participating merchants, third parties, or affiliates in order to provide you rewards and benefits, and for our and their targeted advertising purposes, may be deemed a “sale” or “sharing” of your personal information.

To that end, in the preceding 12 months we may have sold, or shared for targeted advertising purposes, the following categories of California Personal Information:

- Unique and online identifiers such as device identifiers, internet protocol addresses, cookie identifiers, beacon identifiers, pixel tags or mobile ad identifiers or similar technology, or other forms of persistent or probabilistic identifiers that can be used to identify a particular consumer or device.
- Commercial information that identifies or could reasonably be linked to you, such as products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Internet or other electronic network activity information identifies or could reasonably be linked to you, such as browsing history, search history and information regarding an individual’s interaction with an internet website, application, or advertisement.

We may have sold or shared each of these categories of personal information with participating merchants, affiliate partners with whom we work to provide offers to you, payment processing and other financial partners we work with to provide the Services and to facilitate your redemption of rewards earned through the Services, and digital advertising providers that automatically collect Internet and Network Activity information about your use of the Services, such as your browsing history, IP address, pages viewed, and links clicked, so that they can use this information to serve you ads for our Services on other sites, and analytics partners that help us collect information on how our Services are used.

We do not have actual knowledge that we sell the personal information of consumers under the age of 16 or share the personal information of consumers under the age of 16 for targeted or cross-context behavioral advertising.

California Personal Information Rights and Choices

The CCPA provides California residents with specific rights regarding their California Personal Information. This section describes those rights and explains how to exercise them.

- **Right to Know**

- California residents have the right to request that we disclose certain information to you about our collection, use, disclosure, and sale of your California Personal Information over the past 12 months. If we receive and confirm a verifiable consumer request from you pursuant to the **Exercising California Personal Information Rights** section below, we will disclose to you, depending on the scope of the request:
 - The categories of California Personal Information we collected about you.
 - The categories of sources for the California Personal Information we collected about you.
 - Our business or commercial purpose for collecting California Personal Information about you.
 - The categories of third parties with which we share your California Personal Information.
 - The specific pieces of California Personal Information we collected about you.
 - If we sold your California Personal Information, a list of the categories of third parties to whom we disclosed the California Personal Information identifying the categories of California Personal Information sold to those parties in the preceding 12 months.
 - If we disclosed your California Personal Information for a business purpose, a list of the categories of third parties to whom we disclosed California Personal Information for a business purpose identifying the categories of California Personal Information disclosed to those parties in the preceding 12 months.

- **Right to Request Deletion.** California residents have the right to request that we delete California Personal Information, subject to certain exceptions. Once we receive and confirm your verifiable consumer request pursuant to the “Exercising Access, Data Portability, and Deletion Rights” section below, we will delete your California Personal Information from our records, unless an exception applies.
- **Right to Request Correction.** California Residents can ask us to correct information about them that is inaccurate. We will take into account the nature of the personal information and the purposes of our processing when we address your request.
- **Right to opt out of our sale and sharing of personal information for targeted or cross-context behavioral advertising.** California residents have the right to opt out of our sale and sharing of California Personal Information for targeted or cross-context behavioral advertising. You may exercise this right by visiting the following link: [Do Not Sell or Share My Personal Information](#)

We have also configured our Services to process opt-out preference signals that may allow you to inform us of your desire to opt out of sales or sharing as described in the above paragraph. Opt-out preference signals must be in a format commonly used and recognized by businesses and be delivered by a platform, technology, or mechanism that makes clear to consumers that the use of the signal is meant to have the effect of opting the consumer out of sales and sharing of personal information as described above. If you do not have a Givebacks account or are not logged into your Givebacks account, your opt-out preference signal will be linked to your browser identifier only and may not be linked to other personal information, such as account information, about you that we process that is not associated with your browser identifier.

If we receive an opt-out preference signal from you, we may offer you the option to provide additional information to help facilitate your opt-out request. We may also notify you if an opt-out preference signal we receive from you conflicts with your privacy settings or participation in certain programs we offer, and request your consent to sales or sharing of personal information or to affirm your intent to withdraw from any relevant programs.

Even if you opt out of or sharing or processing of your personal information for targeted or cross-context behavioral advertising, you may still see our ads online at other sites and apps, and we may still base aspects of ads on your interactions with us and the Services.

Exercising California Personal Information Rights

To exercise the rights to know, correct, and delete California Personal Information as described above, please submit a verifiable consumer request to us by either:

- Emailing us at: support@givebacks.com; or
- Submitting a request by mail to: Givebacks, Inc., 3041 Farrior Road, Raleigh, NC 27607

You may designate an authorized agent to submit requests to exercise these rights on your behalf through a signed written permission that authorizes the agent to act on your behalf. We may mandate additional requirements when submitted through an authorized agent, such as requiring you to verify your identity directly with us or to directly confirm the authorized agent's permission to act on your behalf.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. Your request must provide information sufficient to permit us to reasonably verify you are the person about whom we collected California Personal Information, or an authorized agent of that person. In order to verify your request, we may require you to provide additional information, including account profile information such as your email address and other information elements necessary to verify your identity. Your request also must include sufficient detail for us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with California Personal Information if we cannot verify your identity or authority to make the request and confirm the California Personal Information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, if you have a password-protected account with us we consider requests made through that account sufficiently verified when the request relates to California Personal Information associated with that specific account.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision, and we reserve the right to either refuse to act on your request or charge you a reasonable fee to complete your request if it is excessive, repetitive, or manifestly unfounded.

Non-Discrimination

You have the right to not receive discriminatory treatment for exercising your access, data portability, opt-out, and deletion rights described above.

Notice of Financial Incentive

When you use the Services, you may receive discounts, rewards, cash back, price or service differences, or other financial benefits. Because we ask you to provide, and we may share with third parties with whom we work, your California Personal Information in order to enable you to receive these benefits, including information about

your shopping and rewards information, your browsing activity information, transaction information collected through the Card-Linked Offer Program, and information we receive from participating merchants and other business partners, the Services may be considered to involve a “financial incentive” under the CCPA.

You can opt into the financial incentive or price or service difference by installing and using our browser extension or mobile application, participating in the Card-Linked Offer Program, or otherwise submitting your California Personal Information to us. If you subsequently wish to withdraw from the financial incentive or price or service difference, you can stop the collection of information by our mobile applications and/or browser extensions and/or opt out of the Card-Linked Offers Program by taking the steps described in the **Card-Linked Offers Program** and/or **Shop to Give Browser Extension** section of this Privacy Policy, or contact us at support@givebacks.com.

Each financial incentive or price or service difference related to the collection and sharing of California Personal Information is based upon our reasonable determination of the estimated value of such information, which is inherently variable and depends on your purchasing and reward redemption activity. The estimated value takes into consideration, without limitation, estimates regarding the anticipated revenue generated from such information, the anticipated expenses which might be incurred in the collection, storage, and use of such information in the operation of our business, and other relevant factors related to the estimated value of such information to our business, as permitted under the CCPA.

Shine the Light

California’s “Shine the Light” law, S.B. 27, California Civil Code Section 1798.83, permits California residents who have an established business relationship with us to request certain information regarding our disclosures of their personal information (as defined by that law) during the preceding year, if any, to third parties for those parties’ own direct marketing purposes. If you are a California resident who has an established business relationship with us and wish to exercise your rights under that law, please send your written request by mail to Givebacks, Inc., 3041 Farris Road, Raleigh, NC 27607.

Offering-Specific Details

Givebacks for Nonprofits

Among other Services, Givebacks provides solutions to nonprofit organizations such as Parent Teacher Associations and Parent Teacher Organizations that enable those organizations to manage and communicate with their members, supporters, and volunteers.

When you use the Services as a member, supporter, or volunteer of one of these organizations (referred to here as your “Organization”), we may ask you to create a profile and submit certain personal information such as your name; phone number; email address; mailing address; other biographical information you choose to provide; your profile photograph; information about your children and other family members, such as their names, genders, classroom, and relationship with you; and credentials such as a username and password to enable you to access the Services (collectively, “Profile Information”).

We use Profile Information to provide the Services to your Organization, to facilitate your use of the Services, to communicate with you about the Services, to improve the Services and develop new Services, and to fulfill our obligations under our agreement(s) with your Organization. Your Organization may also use Profile Information to communicate with you, including by sending you emails through our Services.

We will also collect documents, files, text, data, graphics, images, photos, video or other audiovisual content, including personal information, that you choose to upload, transmit, publish, and otherwise display through the Services (collectively, “User Content”).

We use User Content to provide the Services, to improve the Services and develop new Services, and to fulfill our obligations under our agreement(s) with your organization.

You Profile Information and any User Content that you choose to upload, transmit, publish, and otherwise display through the Services may be shared with your Organization and any Givebacks users associated with your Organization. By default, your Profile Information will be shared with all other Registered Users associated with your Organization. In particular, your children's names (if provided) are always visible to Registered Users associated with your Organization. The other parties with whom your User Content is shared depend on the context in which you share it. If you choose, User Content can be shared with, and will be visible to, all users associated with your Organization. Other User Content (such as messages between you and another individual Organization member) may be visible only to a subset of your Organization, such as other parents in your child's class or other members of "hubs" within your Organization, such as committees or boards.

Your User Content is posted on and transmitted to others in your Organization at your own risk. We cannot control the actions of other users of the Services with whom you may choose to share your User Content, and therefore we cannot and do not guarantee that your User Content will not be viewed by unauthorized persons.

Shop to Give Browser Extension

When you install the Shop to Give browser extension, in addition to collecting the shopping and rewards information described above, we will automatically track all websites you visit using the browser for which you have installed the extension, and your activity on those websites, including participating merchants, products, services, and offers you searched for, viewed, or clicked; the websites you visit and your browsing activity on those sites; and transaction information related to our Services, including purchase confirmation data and rewards accrued through the Services.

You can stop all collection of information by the Shop to Give browser extension by uninstalling the browser extension. In some instances, you can opt out of certain data collection by updating your Settings within the browser extension or your mobile device settings.

Card-Linked Offers Program

If you elect to participate in our Card-Linked Offers Program and link an eligible debit or credit card to your account, Givebacks and our third party service providers will collect personal information and transaction data which may include your contact details, eligible debit or credit card details, and the transaction details for qualifying purchases of goods and services at participating merchants from your eligible debit or credit card network (e.g., Visa, Mastercard, American Express), and from other partners we work with that operate card-linked offer networks, including Rakuten Card Linked Offer Network, Inc. and Rewards Network Establishment Services, Inc. The information we receive will include transaction details for purchases you make using the linked eligible debit or credit card, including participating merchant name, participating merchant location or other store identifier, transaction date, and transaction amount. Notwithstanding anything to the contrary in the Terms of Service or this Privacy Policy, Givebacks and its Third Party Service Providers (including Rakuten Card Linked Offer Network, Inc. and Rewards Network Establishment Services, Inc.) will use and share transaction information in connection with the Card Linked Offers Program as follows:

- Use transaction data to confirm a qualifying purchase or return to match transactions to confirm whether you qualify for a statement credit or an Offer;
- Share transaction data with the participating merchant where a transaction occurred as needed for the merchant to confirm a specific transaction occurred or points should be awarded; for example, the date and amount of your purchase and the last 4 digits of your card number so the merchant can verify your purchase with its records if there is a missing or disputed transaction;

- Provide participating merchants or third party service providers aggregated and anonymized information relating specifically to registered card activity solely to allow participating merchants and third party service providers to assess the results of their campaign;
- Use anonymized and aggregated transaction data to conduct analysis for the improvement and optimization of the Card Linked Offers Program; and
- Provide information in order to respond to a request from government authority or a payment organization involved in a transaction with you or a merchant.

By participating in the Card Linked Offers Program, you authorize the sharing, exchange and use of transaction data described above and herein by and among Givebacks and Givebacks' third party service providers, applicable payment card networks and applicable participating merchants.

By registering a payment card in connection with transaction monitoring, you authorize Givebacks and its third party service providers to share your payment card information with Mastercard, Visa and American Express. You authorize Mastercard, Visa and American Express to monitor transactions on your registered card(s) to identify qualifying purchases in order to determine whether you have qualified for or earned an offer linked to your payment card, and for Mastercard, Visa and American Express to share such transaction details with Givebacks and its third party service providers to enable your card-linked offer(s). You may opt-out of transaction monitoring on the payment card(s) you have registered by logging into your Givebacks account and clicking "Manage Connected Cards," selecting the card for which you wish to opt-out, and clicking "Remove This Card." You must repeat this process for every card for which you wish to opt out of transaction monitoring.

Contacting Us

If you have any questions about these privacy policies or information practices, please contact us by email at support@givebacks.com or by mail at Givebacks, Inc., 3041 Farris Road, Raleigh, NC 27607.

Changes to this Privacy Policy

We reserve the right to change the terms of this Privacy Policy at any time. When we change the Privacy Policy, we will update the "Last Updated Date" above and post the modification on our website. Your continued use of the Services following the posting of changes to this Privacy Policy means you accept those changes.