1. <u>INTRODUCTION</u>

All California Young People in Alcoholics Anonymous, Inc, a California non-profit corporation ("**ACYPAA"**, the "**Company**", "we", "us", or "our"), respects your privacy, and we are committed to protecting it through our compliance with this policy.

ACYPAA's Website provides information, resources, programs and support for young people suffering from alcoholism ("Services"). We accept bids and requests for proposals from users to host annual meetings ("Roundups"), and we sell ACYPAA merchandise ("Products") through the Website.

This privacy policy ("**Privacy Policy**") describes the types of information we may collect from you or that you may provide when you visit the website: https://www.acypaa.org ("**Website**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy applies to information we collect:

- On our Website.
- In email, text, and other electronic messages between you and the Company.

It does not apply to information collected by:

- The Company, offline or through any other means, including on any other website operated by us or any third party.
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please review this Privacy Policy and our Terms of Use prior to further use of the Website. By using this Website, you agree to the terms of this Privacy Policy and our Terms of Use. If you do not agree with our policies and practices, please do not use our Website. If you still have any questions or concerns, please contact us at webmaster@acypaa.org.

This Privacy Policy is expressly incorporated into our Terms of Use located at: [https://www.acypaa.org/docs]

This Privacy Policy may be updated or revised from time to time. We may do so, at any time and without notice (except to the extent required by law), by posting the revised version on this Website. We suggest that you review this Privacy Policy periodically for any such changes. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the Privacy Policy periodically for updates.

2. CHILDREN UNDER THE AGE OF 13

Our Website is not directed toward children under thirteen (13) years of age ("**Child/ren**"). We do not knowingly collect personal information from Children. If you are under 13 years old, you may not use the Website without your parent's or legal guardian's permission, and you must not provide any information to this Website or purchase any Products from us without verifiable consent from a parent or legal guardian. If we learn we have collected or received personal

information from a Child without verifiable consent, we will delete that information. If you believe we have any information from or about a Child, please contact us at: webmaster@acypaa.org.

3. MINORS UNDER THE AGE OF 18 AND OLDER THAN 13

Our Website may be accessed by users who are under eighteen (18) years of age but over thirteen (13) years of age ("**Minor**"). Our Website does not sell the personal information of Minors for any purpose. We only use the personal information of Minors after receiving consent and then only for our internal business purposes and to communicate with a Minor regarding our Services and Roundups. You must not purchase any Products from us without the consent of a parent or legal guardian.

4. INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

A. General

We minimize the collection of personally identifiable information to the least amount required to complete a particular transaction. We currently do not collect any personal information indirectly from you when you visit our Website. We collect several types of information from and about users of our Website, including:

- Information about an individual that could reasonably be used to identify or contact that individual such as: your first and last name, email address, county of residence, phone number, preferred pronouns, and accessibility information ("personal information").
- Information that is about you but individually does not identify you, such as Internet Protocol (IP), address and time zone.
- If you access our Website from your mobile device, we may collect information about that devices such as a unique device identifier (UDID), mobile phone number, and details about your mobile carrier.
- If you purchase Products from our store, we will collect payment information which is shared with our third-party payment processor(s). We do not store payment information after a transaction is completed.
- Information that is non-personally identifiable including: a "referring" site from which you initially arrived at our Website or encrypted federated login information.
- Information that is collected automatically, which may include usage details, IP addresses, and information collected through cookies and other tracking technologies.
- Information from third parties, for example, our business partners or third-party sign-on partners (such as Venmo or Square).

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the Website.

B. <u>Information We Collect Through Automatic Data Collection Technologies</u>

As you navigate through and interact with the Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

• Traffic data, location data, logs, and other communication data and the resources that you access and use on Website.

• Information about your computer or mobile device and internet connection, including your IP address, location data, operating system, and browser type.

The information we collect automatically is statistical data and does not include personal information. It helps us to improve the Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Speed up your searches.
- Recognize you when you return to the Website.

The technologies we use for this automatic data collection may include Cookies (or browser cookies)

We use different types of cookies for different reasons. Our cookies policy is further explained below.

5. COOKIES POLICY

We may use cookies and similar automatic tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in this section.

A. About cookies

A cookie is a small file placed on the hard drive of your device. Cookies are used to "remember" you, to provide you with content relevant to your interests, for security reasons, and to help us understand how our Website is being used.

B. Types of Cookies We Use

We and our Service Providers use 2 types of cookies in providing the Services: (i) required and (ii) analytics/performance. Required cookies are essential to provide necessary security, enable you to browse around our Website and use the features; (iii) advertising and marketing. Performance cookies collect information about how you use our Website. We do not currently use marketing cookies and will update this Privacy Policy if we use marketing cookies in the future.

Our cookies may change as our Website and business needs change; however, the following is a list of some of the cookies we and our Service Providers use and what they do:

Cookie	Туре	Purpose
XSRF-TOKEN	Required	This cookie prevents cross-site request forgery attacks.
svSession	Performance	Identifies unique visitors and tracks a visitor's sessions on a site and provides statistics and analytics regarding website use.

hs	Required	Security cookie.
TS*	Required	Used for security and anti-fraud purposes

C. Our Website may contain cookies set by third parties

Some content or applications on the Website may be served by third parties, including advertisers, content providers, and application providers (collectively, "Service Providers"). These Service Providers may use cookies alone or in conjunction with transparent pixels, web beacons or other tracking technologies to collect information about you when you use the Website. The information they collect may be associated with your personal information or 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 are not responsible for any third-party Service Provider tracking of your web browsing.

We partner with the following Service Providers:

 We use Wix as our Website host and online shopping platform. Their privacy policy is located here: https://www.wix.com/about/privacy

We do not control our Service Providers' tracking technologies or how they may be used. The web addresses to our Service Providers' privacy practices provided in this section are for your convenience only and may change without notice to us. If you have any questions about a Service Providers, an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see "Choices About How We Use and Disclose Your Information."

We do not use tracking technologies to collect information about your online activities over time or across third-party websites or other online services (behavioral tracking). However, third-party sites that link to our Website (such as Google, LinkedIn, or Facebook) may engage in behavioral tracking.

D. How You Can Control Cookies

Most browsers and mobile devices allow you to control cookies, including whether or not to accept them and how to remove them. You may refuse to accept browser cookies by activating the appropriate setting on your device's browser. However, if you select this setting, you may be unable to access certain parts of the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Website. You can learn more about cookies and how to manage them here: https://www.aboutcookies.org/how-to-manage-and-delete-cookies.

To opt-out of interest-based advertising by advertisers on our Services (if applicable), visit http://www.aboutads.info/choices/.

6. OUR "DO NOT TRACK" POLICY

Some web browsers offer a "Do Not Track" option, which sends a signal to a website regarding that user's preference regarding tracking. Currently, there is no "Do Not Track" technology standard for how any company abides by a "Do Not Track" signal received from a user's web browser.

Our Website does NOT respond to "Do Not Track" signals from your web browser.

7. HOW WE USE YOUR INFORMATION

We do NOT sell user personal information.

We use information that we collect about you or that you provide to us, including any personal information:

- To present the Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- For email communications.
- To complete transactions that you initiate with us.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to the Website or any products or services we offer or provide though it.
- To allow you to access and participate in interactive features on the Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

8. RETENTION POLICY

The time periods for which we retain information we collect depend on the purposes for which we use it. The Company will keep your information for as long as you are a registered subscriber or user of our Website or for as long as we have a business purpose to do so and, thereafter, for no longer than is required or permitted by law.

9. DISCLOSURE OF YOUR INFORMATION

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

We may disclose personal information that we collect, or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To 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 assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.

• With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Terms of Use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others.

10. CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- <u>Tracking Technologies and Advertising</u>. 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, please note that some parts of this Website may then be inaccessible or not function properly.
- <u>Third-Party Tracking</u>. We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way.

11. ACCESSING AND CORRECTING YOUR INFORMATION

You may request updating, correction or deletion of any personal information you provided to the Company by contacting us directly. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

12. DATA SECURITY

We have implemented commercially reasonable measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure, including regular backups, limiting access to our Website's control panel and databases, two-factor authentication to access our website's control panel and databases, SSH/SSL technologies and HTTPS. All information you provide to us is stored on secure servers behind firewalls. Our web hosting platform at Wix has additional safeguards in place.

The safety and security of your information also depends on you. You can help protect your computer or mobile device by keeping it up to date/patched as well as running antivirus programs to protect your online browsing.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

13. NOTICE TO CALIFORNIA USERS

This Supplemental California Privacy Notice only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 ("CCPA") and the California Privacy Rights Act ("CPRA"). The CCPA and CPRA specify certain privacy rights that natural persons who are California residents have regarding what categories of personal information the Company, has collected about them; whether we have disclosed or sold that personal information for a business purpose (e.g., to a service provider) in the preceding twelve (12) months; along with other rights including correction and deletion of collected personal information.

For purposes of California laws, we do not "sell" personal information, nor do we have actual knowledge of any "sale" of personal information of minors under sixteen (16) years of age.

Categories of personal information we may collect about you:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES
B. Personal information categories listed in the California Customer Records statute	Social Security number, passport number, driver's license or state identification card number, insurance policy number, employment, employment history, financial information, medical information, or health insurance information	NO
C. Protected classification characteristics under California or federal law	Gender and date of birth	NO
D. Commercial information	Transaction information, purchase history, financial details, and payment information	YES
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements	NO
G. Geolocation data	Device location	YES
H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our services at a business level or job title, work history, and professional qualifications if you apply for a job with us	NO
J. Education Information	Student records and directory information	NO
K. Inferences drawn from other personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	NO

We may also collect other personal information outside of these categories instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

You have the right not to receive discriminatory treatment from us for exercising the privacy rights granted by the CCPA and CPRA.

14. VERIFIABLE CONSUMER REQUESTS

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. In order to verify your request, we will ask you to provide your name, email address, and certain other pieces of identifying information. Once you have submitted this information and any necessary supporting documentation, we will confirm the information by reviewing it against our records. To designate an authorized agent, please contact us as set forth below.

15. CHANGES TO OUR PRIVACY POLICY

It is our policy to post any changes we make to our Privacy Policy on this page with a notice that the Privacy Policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you by email to the specified in your account and through a notice on the Website home page. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this Privacy Policy to check for any changes. By continuing to access or use the Site or the Services after those changes become effective, you agree to be bound by the revised policy.

DISCLAIMER

Our Website may contain links to other websites. When you link to another website, you leave our Website, which means that this Privacy Policy will no longer apply. When you link to another website, you are subject to the privacy policy of that website.

17. CONTACT INFORMATION

To ask questions or comment about this Privacy Policy and our privacy practices or to exercise your rights as described in this Privacy Policy, please contact us at: webmaster@acypaa.org.

Notices may be sent to: 440 N. Barranca Avenue, Ste. 7513 Covina, CA 91723