

# Privacy Policy for California Residents

**Effective Date:** January 1, 2021

**Last Updated On:** January 1, 2021

This **Privacy Policy for California Residents** supplements the information contained in the Privacy Policy on [www.organina-na.com](http://www.organina-na.com) and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Policy.

This Policy does not apply to workforce-related personal information collected from California-based employees, job applicants, contractors, or similar individuals.

## Information We Collect and Share

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope.

Below, we provide a list of categories of personal information as set forth in the CCPA that have been collected, disclosed for business purposes, or sold for commercial purposes (as defined by the CCPA) during the preceding 12 months, as well as certain other information. Please see the other sections of the Privacy Policy for additional information and context.

Category	Examples	Collected	Explanation
Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	YES	We may use this information to respond to your questions, to enable you to participate in our programs (including sweepstakes or contests), to process your registration with sites and apps, and for other business purposes.
Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO	
Commercial information.	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES	We may use your information to provide you with products, to identify other products and offers that may be relevant to

			you, and for other business purposes.
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	We may use this information to improve our Services, to better understand the visitors who come to our Services and what content is of interest to them, and for other business purposes.
G. Geolocation data.	Physical location or movements.	YES	We may use this information to improve the quality, security, and relevance of our Services to our visitors and for other business purposes.
K. Inferences drawn from other personal information.	Our inferences about you.	YES	We may use this information to personalize your experience with us, and for other business purposes.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete on our Website.
- Indirectly from you. For example, from observing your actions on our Website.
- From third parties. For example, from our business partners. We may also receive information from commercial sources such as companies who compile information about shoppers and their preferences. Social media platforms may also give us information about you, and we may get information about your interactions with our ads on third-party sites

We share personal information with third parties in various ways as described in our Privacy Policy. We do not consider the ways we share your personal information to comprise the sale of your information. You may learn about ways in which you can control the collection of information about you by visiting Personal Information Opt-Out and Opt-In Rights.

### **Use of Personal Information**

We may use, sell, or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to or ask a question about our products, we will use that personal information to respond to your inquiry. We may also save your information to facilitate subsequent communication with you.
- To provide, support, personalize, and develop our Website, products, and services.
- To process your requests, transactions, and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).

- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Website users or consumers is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

#### ***Right to Know and Data Portability***

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity (See *Exercising Your Rights to Know or Delete*), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

### ***Right to Delete; Right to Access***

You may request that we delete the Personal Information that we've collected from or about you. If we cannot delete all of your Personal Information, we will let you know the reason for non-deletion, such as if we need to complete a transaction for you, or for a legal reason.

We may take steps to verify your identity based on the information we have on file about you before responding to your Access or Deletion Request. You may need to provide your email address to be used for this purpose.

You may make up to two requests per year for information as to:

- The categories of Personal Information that we've collected and sold about you, or shared for a business purpose with our service providers;
- The sources from which we collected such information;
- The third parties with whom we've shared that Personal Information and to whom we've sold that Personal Information.
- The business or commercial purpose for collecting or selling that Personal Information.
- The specific pieces of Personal Information we've collected about you.

### ***Exercising Your Rights to Know or Delete***

To exercise your rights (or those of your child) to know or delete described above, please submit a request by emailing us at [promotions@orangina-na.com](mailto:promotions@orangina-na.com).

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know or delete. We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

For instructions on exercising your sale opt-out or opt-in rights, see [Personal Information Sales Opt-Out and Opt-In Rights](#).

### ***Response Timing and Format***

We will confirm receipt of your request within ten (10) business days.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

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 provide you with a cost estimate before completing your request.

### ***Personal Information Sales Opt-Out and Opt-In Rights***

If you are age 16 or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not knowingly sell the personal information of consumers we actually know are less than 16 years old. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to by email to [promotions@orangina-na.com](mailto:promotions@orangina-na.com).

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back into personal information sales at any time by email to [promotions@orangina-na.com](mailto:promotions@orangina-na.com).

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

### **Non-Discrimination and Notice of Financial Incentive**

We will not discriminate against you for exercising any of your CCPA rights.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

### **Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [promotions@orangina-na.com](mailto:promotions@orangina-na.com).

### **Changes to Our Privacy Policy**

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

### **Contact Information**

If you have any questions or comments about this notice, the ways in which we collect and use your information described here and in the **Privacy Policy**, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at [promotions@orangina-na.com](mailto:promotions@orangina-na.com).

If you need to access this Policy in an alternative format due to having a disability, please contact us at [promotions@orangina-na.com](mailto:promotions@orangina-na.com).