

## CALIFORNIA PRIVACY NOTICE

This CALIFORNIA PRIVACY NOTICE supplements the information contained in the Terms and Conditions for the Fully Prepped service (the “**Service**”) operated by RBC Ventures Inc. (“**we**”, “**us**”, “**our**”) and applies solely to users of the Service who reside in the State of California (“**you**”, “**your**”). 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 notice.

### **Information We Collect and How it is Used**

In the preceding twelve (12) months, we have collected the following categories of personal information from consumers:

<b>Category</b>	<b>Examples</b>	<b>Collected</b>	<b>Source</b>	<b>Business Purpose(s)</b>
<i>A. Identifiers</i>	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	YES	Directly from you	To create, maintain, customize and secure your account with us; and/or to communicate to you any benefit, feature and other information about the Services.
<i>B. Personal Information categories listed in the California Customer Records statute</i>	A 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 information, medical information, or health insurance information.	YES	Directly from you	To personalize your Website experience.
<i>C. Protected classification characteristics under California or federal law</i>	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,	NO	-	-

	gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).			
D. <i>Commercial information</i>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO	-	-
E. <i>Biometric information</i>	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO	-	-
F. <i>Internet or other similar network activity</i>	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	Indirectly from you	To help us better understand the current and future needs of our users, including to develop and improve our Website.
G. <i>Geolocation data</i>	Physical location or movements.	NO	-	-
H. <i>Sensory data</i>	Audio, electronic, visual, thermal, olfactory, or similar information.	YES	Directly from you	To fulfill or meet the reason you provided the information.
I. <i>Professional or employment-related information</i>	Current or past job history or performance evaluations.	YES	Directly from you	To help us better understand the current and future needs of our users, including to develop and

				improve our Website.
J. <i>Non-public education information (per the Family Education Rights and Privacy Act)</i>	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO	-	-
K. <i>Inferences drawn from other personal information</i>	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES	Directly from you; and/or from service providers we refer you to (e.g. for personality, psychological or similar assessments).	To fulfill or meet the reason you provided the information.

### **Other Optional Uses of Your Personal Information**

We may use or disclose the personal information we collect for one or more of the following business purposes, unless you've contacted us at [info@fullyprepped.com](mailto:info@fullyprepped.com) to indicate that you do not wish for us to use your information for these purposes:

- To promote our products and services (or those of third parties), which may be of interest to you.
- To refer you to one or more of our affiliated companies.
- To consolidate the information you provide to us with information our affiliated companies have about you to allow us and our affiliated companies to manage the relationship with you.

***Note: 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.***

### **Sharing Personal Information**

We may disclose your personal information to a third party for the business purpose(s) indicated above. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose(s) and requires the recipient to keep the information confidential and not to use for any purpose except for performing the service in the contract.

We share your personal information with the following categories of third parties:

- Service providers – e.g., to facilitate the use of certain personality, psychological or similar assessments.
- Our affiliated companies – e.g., to manage our risks and operations and those of our affiliated companies; to comply with valid requests for information about you from regulators, government agencies, public bodies and other entities who have a right to issue such requests; and, to let our affiliated companies know your choices under “Other Optional Uses of your Personal Information”.

In the preceding twelve (12) months, we have disclosed the following categories of personal information to either a service provider or our affiliated companies, for a business purpose:

- Category A: Identifiers
- Category B: Personal Information categories listed in the California Customer Records statute
- Category C: Protected classification characteristics under California or federal law

### **Personal Information We Sell**

We do not sell personal information and have not sold personal information of our users in the previous twelve (12) months.

### **Your Rights under the CCPA**

#### **A) Right to Access**

You have the right to request, up to two (2) times every twelve (12) months, that we disclose to you the following, subject to certain exceptions allowable under applicable law:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business purpose for collecting that personal information.
- The categories of personal information disclosed for a business purpose during the last twelve (12) months and the categories of third parties to whom we shared that personal information.
- The specific pieces of personal information we collected about you.

#### **B) Right to Deletion**

You have the right to request that we delete any personal information about you which we have collected from you, subject to certain exceptions allowed under applicable law.

#### **C) Submitting a Verifiable Request:**

You may submit an access or deletion request by contacting us: (i) at [info@fullyprepped.com](mailto:info@fullyprepped.com); or (ii) through the Contact Us tab on our website by selecting “Request to access information” in the drop down menu.

When submitting an access or deletion request, you must:

- Provide us with information that enables us to verify your identify (and, as applicable, of your authorized representative) in order for us to respond to your request.

- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will take reasonable steps to verify your identity (or the identity and authority of your authorized representative) prior to responding to your request. You agree to respond to our reasonable requests for additional information to enable us to verify your identity in connection with the request.

Upon receiving a verifiable request, we will: (i) acknowledge receipt of the request within ten (10) business days; and (ii) provide you with the requested information required by the CCPA within 45 days of your request, or such additional time as may be permitted by the CCPA. We will deliver the information electronically to you, free of charge.

**D) Right to Non-Discrimination:**

We will not discriminate against you because you elect to exercise any of your rights under the CCPA including, but not limited to:

- Denying goods or services to you.
- Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties on you.
- Providing a different level or quality of goods or services to you.
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

**Updates**

This California Privacy Notice was last reviewed on April 15, 2020 and updated on April 15, 2020. We may modify this California Privacy Notice at any time. For any questions concerning our privacy policies and practices, please contact [info@fullyprepped.com](mailto:info@fullyprepped.com).