GROUPON, INC. PRIVACY STATEMENT

Effective Date: August 31, 2020

This Privacy Notice (“**Privacy Notice**”) explains how Groupon, Inc., its affiliates, and its subsidiaries (“**Groupon**,” “**us**,” “**our**,” and “**we**”) use your information and applies to all who use our websites and platforms – including mobile applications, touch technologies, electronic services, social networking sites, interactive features, online services or any of our described online activities we own or control (collectively, the “**Service**”). For terms that govern the use of the Service, please review the Service’s [Terms of Use](https://www.groupon.com/legal/termsofservice)**.**

By using the Service, you acknowledge you have read the terms of this Privacy Notice. If you do not want your information handled as described in this Privacy Notice, please do not provide us with your information or interact with the Service.

We may modify this Privacy Notice at any time. If we make any material changes, we will notify you by email (sent to the email address specified in your account) or by means of notice on the Service prior to the change becoming effective. You can determine when this Privacy Notice was last revised by referring to the "Effective Date” above.

This Privacy Notice is organized as follows:

1. [Types of Information We Collect](https://www.groupon.com/legal/privacypolicy#Item1)
2. [How Groupon Collects Information](https://www.groupon.com/legal/privacypolicy#Item2)
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1. Types of Information We Collect

We may collect the following categories of personal information from and about you:

●        Identifiers: such as your name, postal addresses, email addresses, social networking website user account names, telephone numbers, or other addresses at which you are able to receive communications.

●        Demographic information: such as your age, birthdate, and gender.

●        Commercial information: such as information that enables us to determine lifestyle, interests, and activities, including purchasing tendencies and order history (such as the Groupon vouchers you purchase and redeem); areas of interest; information collected through your interactions with social networks; information about persons for whom you have purchased Groupon vouchers as gifts or who have bought Groupon vouchers as gifts for you; and information about friends who refer you or whom you have referred.

●        Location information: such as information related to your state/province, city, or neighborhood, and, if you agree, more specific location information that is provided through the GPS functionality on mobile devices used to access the Service.

●        Financial information: such as information collected from you as needed to process payments for Groupon vouchers or other products or services that you buy, or as provided by you to administer your participation in optional services and programs, such as your payment card number, expiration date, and card verification number.

●        Internet and network activity information: such as information about your browsing behavior, search history, and interactions with websites and advertisements, including data from cookies, pixel tags, and web beacons.

●        Inferences regarding preferences and other characteristics: such as our assessment of the types of products or services you may have an interest in.

2. How Groupon Collects Information

We may collect personal information about you from a variety of sources, including:

·         From you: We collect information that you submit to us. For example, when you use the Service; make a purchase; register to receive information, products, or services available through the Service; or interact with us in other ways. We will collect any information you voluntarily provide, and we may also request optional information to support your use of the Service. We also collect any information that you voluntarily enter into any postings, comments, or forums within the Service. If you send an e-mail to us, we will collect your e-mail address and the full content of your e-mail, including attached files and other information you choose to provide to us.

 ·         From your device: When you use the Service, we may collect information about the devices you use to access the Service, including hardware model, operating system and version, Internet Protocol (“IP”) address, and other unique device identifiers, mobile network information, and information about the device’s interaction with our Service. We also collect information about how you use our Service, including your access times, browser types, and language. This type of data enables us to understand how often individuals use parts of the Service so we can analyze and improve it. To collect this information, we use cookies and web beacons, and other similar technologies. To learn more about how we automatically receive and record information when you interact with the Service, please review our [Cookies Policy](https://www.groupon.com/legal/cookiepolicy). Note that this Privacy Notice covers only how we use information collected via cookies; it does not cover the use of such information by third parties.

·         Location information: We may collect different types of information about your location, including general information, such as the city, state, and/or zip code associated with your IP Address, and, if you agree, more specific location information that is provided through the GPS functionality on mobile devices used to access the Service. We may use such location information to customize the Service, including advertising that is presented to you. In order to do this, your location information may be passed along to our affiliates, agents, vendors or advertisers. You may be able to disallow our use of certain location data through your device or browser settings, for example, by disabling “Location” services for the Groupon application in iOS privacy settings.

·         Social media networks and other third parties: We may obtain information about you or your use of the Service from third party sources, such as our vendors, like web hosting providers, analytics providers, or advertisers. You may give us permission to access your information from services offered by third parties, including social media networks. The information we obtain from third party services depends on your account/privacy settings with those third parties and the third parties’ privacy policies, so be sure to check those policies and to adjust your settings to meet your preferences. When you access the Service through social media networks and other third party platforms, you are authorizing Groupon to collect, store, and use such information and content in accordance with this Privacy Notice. Please keep in mind that any information provided to us by a third party may also be subject to that third party’s privacy policy.

3. How Groupon Uses Information

We may use information collected as described in this Privacy Notice to:

●        Operate, maintain, and improve the Service and other programs, features, and functionality related to the Service;

●        Provide you with interest-based ads, push notifications, communications, and offers for products and services from us and our business partners, including based on your precise geolocation;

●        Facilitate and fulfill orders  – for example, for Groupon vouchers and other goods and services, including tracking redemption;

●        Process and confirm bookings with our partners;

●        Process your payments;

●        Evaluate your eligibility for certain types of offers, products, or services that may be of interest to you, and analyze advertising effectiveness;

●        Answer your questions and respond to your requests;

●        Perform analytics and conduct customer research;

●        Communicate and provide additional information that may be of interest to you about Groupon and our business partners, sometimes by combining your information with information we obtain from other sources;

●        Send you reminders, technical notices, updates, security alerts, support and administrative messages, service bulletins, marketing messages, and requested information, including on behalf of our business partners;

●        Administer rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored by us or our business partners;

●        Manage our everyday business needs, such as administration of the Service, forum management, fulfillment, analytics, fraud prevention, and enforcement of our corporate reporting obligations and [Terms of Use](https://www.groupon.com/legal/termsofservice), or to comply with the law;

●        Allow you to apply for a job, post a video, or sign up for special offers from merchants, our business partners, or other companies;

●        Verify your requests made pursuant to this Privacy Notice;

●        Enhance other information we have about you to help us better understand you and determine your interests;

●        Use your data as described in our Card Linked Deals program, if you consented to participate in such program; and

We also may use information collected as described in this Privacy Notice with your consent or as otherwise required or permitted by law.

Groupon uses your geolocation, including your precise geolocation, consistent with this Privacy Notice as described in [Section 2](https://www.groupon.com/privacy#item2) above to deliver location-based offers, products or services that may be of interest to you.

If you make purchases without creating a password, we link these purchases to your email address and create a secure account in our system. If you create a password at a later date, you will be able to view past purchases made with that email address.

If you use any features on the Service to send information about a product or service to another person, we will also collect the personal information of that other person to the extent disclosed by you and may contact them using the information you provided us.

4. When and Why Groupon Discloses Information

We may share your personal information as follows:

●        as required to comply with the law or legal obligations, such as to comply with legal orders and government requests, or as needed to support auditing, compliance, and corporate governance functions;

●        in response to a subpoena, or similar legal process, including to law enforcement agencies, regulators, and courts in the United States and other countries where we operate;

●        with our vendors who perform a variety of services and functions for us, such as data storage, order fulfillment, transmitting emails, and managing digital content. We may share your information with such vendors subject to confidentiality obligations consistent with this Privacy Notice and on the condition that the service providers use your information only on our behalf and pursuant to our instructions;

●        in the event we go through a business transition such as a merger, acquisition by another company, bankruptcy, reorganization, or sale of all or a portion of our assets (as described below in [Section 10](https://www.groupon.com/privacy#item10));

●        to combat fraud or criminal activity, and to protect our rights, users, and business partners, or as part of legal proceedings affecting Groupon;

●        with our affiliates and subsidiaries who may only use the personal information for the purposes described in this Privacy Notice;

●        if the information has been aggregated, de-identified, or otherwise does not identify you personally; and

●        otherwise with your consent.

We may disclose your personal information to the following categories of third parties:

●        Groupon Entities

●        Merchants

●        Co-marketers

●        Distributors

●        Resellers

●        Advertising Networks

●        Payment Services Providers

●        Internet Service Providers

●        Data Analytics Providers

●        Operating Systems and Platforms

●        Social Networks

●        Government or Law Enforcement Entities

●        Fraud Protection and Prevention Providers

●        Delivery Services Providers

●        Service Providers

We may disclose the following categories of personal information for our own business and operational purposes:

●        Identifiers;

●        Demographics;

●        Commercial information;

●        Location information;

●        Financial information;

●        Internet and network activity information; and

●        Inferences regarding preferences or characteristics.

We may disclose certain personal information in exchange for services, insights, or other valuable consideration. These disclosures may involve:

●        Identifiers;

●        Demographics;

●        Commercial information;

●        Location information;

●        Financial information (not including payment card numbers);

●        Internet and network activity information; and

●        Inferences regarding preferences or characteristics.

5. Security of Personal Information

Groupon has implemented an information security program that contains administrative, technical, and physical controls that are designed to reasonably safeguard personal information. For example, we use industry-standard encryption technology to secure financial account information. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Website, you can contact us at privacy@groupon.com.

6. Your Rights Regarding Personal Information

You have certain rights with regard to your personal information:

●        You have the right to know and request information about the categories and specific pieces of personal information we have collected about you within the last 12 months, as well as the categories of sources from which such information is collected, the purpose for collecting such information, and the categories of third parties with whom we share such information. You also have the right to know if we have sold or disclosed your personal information for business purposes.

●        You have the right to update your [personal information](https://www.groupon.com/privacy#Personal)

●        You have the right to request a portable copy of your [personal information](https://www.groupon.com/privacy#Personal).

●       You have the right to request that Groupon delete your [Personal Information](https://www.groupon.com/privacy#Personal), subject to certain exceptions allowed under applicable law.

●        You have the right to opt-out of certain disclosures of your personal information for valuable consideration. You can exercise this right through our “[Do Not Sell My Personal Information](https://www.groupon.com/legal/privacypolicy#do-not-sell-my-personal-information)” tool.

●        You have the right to not be discriminated against for exercising any of the above-listed rights. We may, however, provide a different level of service or charge a different rate reasonably relating to the value of your personal information.

You may exercise these rights through the [Groupon Data Privacy Portal](https://gr.pn/privacy) or by sending an email to privacy@groupon.com. If you are a consumer under the California Consumer Privacy Act (“CCPA”) and wish to contact us through an authorized agent, the authorized agent can submit a request on your behalf at privacy@groupon.com along with a notice signed by you certifying that the agent is authorized to act on your behalf.We may take reasonable steps to verify your identity, including but not limited to verification of your email, prior to responding to your requests.

In addition to the above rights, you can update or remove financial account information. You can also deactivate your Groupon account.

7. Your Choices

We think that you benefit from a more personalized experience when we know more about you and what you like. However, you can limit the information you provide to Groupon, and you can limit the communications that Groupon sends to you. In particular:

●        Commercial Emails: You may choose not to receive commercial e-mails from us by following the instructions contained in any of the commercial e-mails we send or by logging into your account and adjusting your email preferences. Please note that even if you unsubscribe from commercial email messages, we may still email you non-commercial emails related to your account and your transactions on the Service. You may update your subscription preferences at any time.

●        Cookies and Other Technologies: You may manage how your browser handles cookies by adjusting its privacy and security settings. Browsers are different, so refer to instructions related to your browser to learn about cookie-related and other privacy and security settings that may be available. You can opt-out of being targeted by certain ad-service companies and Groupon-served ads online by using the [National Advertising Initiative’s Opt-Out Tool](https://optout.networkadvertising.org/?c=1)  or the [Digital Advertising Alliance’s (DAA) About Ads Opt-Out Tool](https://optout.aboutads.info/?c=2&lang=EN). For more information review our [Cookies Policy](https://www.groupon.com/legal/cookiepolicy).

Currently, we do not alter our data collection and use practices in response to Do Not Track signals.

We use internet and network activityinformation and device data to directly serve you interest-based ads on third party websites and mobile applications. Interest-based ads served directly by Groupon on third party sites will display the AdChoices icon. If you prefer not to receive interest-based ads from Groupon on third party sites, you can click on the AdChoices icon in the ad, which will direct you to the [Your Groupon AdChoices](https://www.groupon.com/advertising_preference) page where you can opt-out of receiving interest-based ads served by Groupon.

Groupon, Inc. is a member of the Digital Advertising Alliance, which is a media marketing and trade association that has issued self-regulatory guidelines for online advertising. Visit the DAA’s [AdChoices page](https://youradchoices.com/) to learn more about interest-based advertising and to opt-out of having cookies placed by ad-serving companies.

●       Device Data: You may manage how your mobile device and mobile browser share certain device data with Groupon, as well as how your mobile browser handles cookies by adjusting the privacy and security settings on your mobile device. Please refer to the instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

When you first visit or use the Service we may request permission to collect and use your device’s precise geolocation. You can opt not to permit the collection of this information, or permit it only when using the mobile app, but it may limit certain functions or features of the Service. You can control how and whether we collect your precise geolocation information through your device’s settings.

●       Emails from Business Partners: If you wish to opt-out of receiving offers directly from our business partners, you can follow the opt-out instructions in the emails they send you.

8. Social Community Areas

The Service may be accessible through or contain connections to areas where you may be able to publicly post information, communicate with others such as discussion boards or blogs, review products and merchants, and submit media content. Prior to posting in these areas, please read our [Terms of Use](https://www.groupon.com/legal/termsofservice) carefully. All the information you post may be accessible to anyone with Internet access, and any personal information you include in your posting may be read, collected, and used by others. We recommend that you do not post any personal information in the social community areas.

9. Privacy Practices of Third Parties

This Privacy Notice only addresses the use and disclosure of information by Groupon through your interaction with the Service. Other websites that may be accessible through links from the Service and our co-branded websites may have their own privacy notices and personal information collection, use, and disclosure practices. Our business partners may also have their own privacy notices. We encourage you to familiarize yourself with the privacy notices provided by these other parties prior to providing them with information or taking advantage of a sponsored offer or promotion.

10. Business Transfers and Corporate Changes

Groupon reserves the right to disclose, transfer, or license any and all information related to the Service, including personal information:

●        to a subsequent owner, co-owner, or operator of the Service or any portion or operation related to part of Service; or

●        in connection with a corporate merger, consolidation, or restructuring, the sale of substantially all of our stock and/or assets, or other corporate change, including, without limitation, during the course of any due diligence process.

11. Notice to Residents of Countries outside the United States of America

This Service is intended only for users in the United States, Canada, and Mexico. If you live outside the United States and Canada your information will be handled in accordance with [Groupon’s International Privacy Notice](https://www.groupon.co.uk/legal/privacypolicy#internatioinalPrivacy). By using the Service or giving us your personal information, you are directly transferring your personal information to us in the United States. You agree and consent to our collection, transfer, and processing of your personal information in accordance with this Privacy Notice. You are solely responsible for compliance with any data protection or privacy obligations in your jurisdiction when you use the Service or provide us with personal information. Regardless of where we transfer your information, we still protect your information in the manner described in this Privacy Notice.

12. Children’s Privacy

The Service is a general audience site not directed at children under the age of 16 and Groupon has no actual knowledge of the sale of information of minors under 16 years of age.

By using Groupon, you represent that you are at least eighteen years old and understand that you must be at least eighteen years old in order to create an account and purchase the goods or services advertised through the Service.

13. Contact Us

Please contact us if you have any questions or comments about our privacy practices or this Privacy Notice. You can reach us online at privacy@groupon.com. You can reach us via postal mail at the following address:

Groupon Inc.

Attention: Privacy Office

600 West Chicago Avenue

Chicago, Illinois 60654 USA

14. California Privacy Rights and Other Countries

If you reside in Canada, you may have the right to be provided with access to personal information that we have collected about you and written information about our policies and practices with respect to the transfer of your personal information to vendors outside Canada. E-mail us at privacy@groupon.com with questions.

Groupon utilizes various valid data transfer mechanisms for personal information at its sole discretion in accordance with applicable data protection and privacy laws. We will continue to monitor and assess the appropriateness of other valid data transfer mechanisms as they become available.

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request, once a year, if we have shared their personal information with other companies for those companies’ direct marketing purposes during the preceding calendar year. To request a copy of the information disclosure provided by Groupon, please contact us at privacy@groupon.com or the address stated above. Please include “Shine the Light Request” in your correspondence. Please allow 30 days for a response.

If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to privacy@groupon.com. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.