# **Privacy Policy**

Last updated: March 10, 2025

This Privacy Notice for Senior Savings ("we," "us," or "our") describes how and why we might access, collect, store, use, and/or share ("process") your personal information when you use our services ("Services"), including when you:

- Download and use our mobile application (Senior Savings), or any other application of ours that links to this Privacy Notice.
- Senior Savings is a mobile application designed to help users easily find and share exclusive
  discounts available for individuals aged 55 and older. Whether you're looking for restaurant
  discounts, retail savings, or travel deals, our app makes it simple to access the best senior offers
  in one convenient place.
- Engage with us in other related ways, including any sales, marketing, or events.

**Questions or concerns?** Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at <a href="mailto:seniorsavingsapp@gmail.com">seniorsavingsapp@gmail.com</a>.

### SUMMARY OF KEY POINTS

This summary provides key points from our Privacy Notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our <u>table of contents</u> below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about personal information you disclose to us.

**Do we process any sensitive personal information?** Some of the information may be considered "special" or "sensitive" in certain jurisdictions, for example your racial or ethnic origins, sexual orientation, and religious beliefs. We do not process sensitive personal information.

Do we collect any information from third parties? We do not collect any information from third parties.

**How do we process your information?** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about <a href="https://www.normation.com/how-we-process-your-infor

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties. Learn more about when and with whom we share your personal information.

**How do we keep your information safe?** We have adequate organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to

defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe.

**What are your rights?** Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about <u>your privacy</u> rights.

Want to learn more about what we do with any information we collect? Review the Privacy Notice in full.

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# 1. WHAT INFORMATION DO WE COLLECT?

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

**Personal Information Provided by You.** The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use.

The personal information we collect may include the following:

- Name
- Email Address
- Password
- Birth year

**Sensitive Information**. We do not process sensitive information.

# 2. HOW DO WE PROCESS YOUR INFORMATION?

**In Short:** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To facilitate account creation and authentication and otherwise manage user accounts. We
  may process your information so you can create and log in to your account, as well as keep your
  account in working order.
- To deliver and facilitate delivery of services to the user. We may process your information to provide you with the requested service.
- To evaluate and improve our Services, products, marketing, and your experience. We may
  process your information when we believe it is necessary to identify usage trends, determine the
  effectiveness of our promotional campaigns, and to evaluate and improve our Services, products,
  marketing, and your experience.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.
- To determine the effectiveness of our marketing and promotional campaigns. We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.

# 3. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

**In Short:** We may share information on specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

- Business Transfers. We may share or transfer your information in connection with, or during
  negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of
  our business to another company.
- Affiliates. We may share your information with our affiliates, in which case we will require those
  affiliates to honor this Privacy Notice. Affiliates include our parent company and any subsidiaries,
  joint venture partners, or other companies that we control or that are under common control with
  us
- **Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.

### 4. HOW LONG DO WE KEEP YOUR INFORMATION?

**In Short:** We keep your information until you delete your account to fulfill the purposes outlined in this *Privacy Notice unless otherwise required by law.* 

We will only keep your personal information until you delete your account set out in this Privacy Notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us to keep your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

### 5. HOW DO WE KEEP YOUR INFORMATION SAFE?

**In Short:** We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

# 6. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly collect, solicit data from, or market to children under 18 years of age, nor do we knowingly sell such personal information. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at <a href="mailto:seniorsavingsapp@gmail.com">seniorsavingsapp@gmail.com</a>.

# 7. WHAT ARE YOUR PRIVACY RIGHTS?

**In Short:** You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.

**Withdrawing your consent:** If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

#### **Account Information**

If you would at any time like to review or change the information in your account or terminate your account, you can:

Log in to your account settings and update or delete your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

If you have questions or comments about your privacy rights, you may email us at seniorsavingsapp@gmail.com.

### 8. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Notice.

# 9. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

**In Short:** If you are a resident of Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, or Virginia, you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. More information is provided below.

Categories of Personal Information We Collect

We have collected the following:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, telephone or mobile contact number, unique personal identifier, email address, and account name	YES
B. Personal information as defined in the California Customer Records statute	Name and contact information	YES
C. Protected classification characteristics under state or federal law	Age and date of birth	YES
D. Commercial information	Transaction information and purchase history	YES
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data,	NO

G. Geolocation data	and interactions with our and other websites, applications, systems, and advertisements  Device location	NO
H. Audio, electronic, sensory, 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 collected 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
L. Sensitive personal Information		NO

We may also collect other personal information outside of these categories through 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 or contests
- Facilitation in the delivery of our Services and to respond to your inquiries.

We will use and retain the collected personal information as needed to provide the Services or for:

- Category A As long as the user has an account with us
- Category B As long as the user has an account with us
- Category C As long as the user has an account with us
- Category D As long as the user has an account with us

### **Sources of Personal Information**

Learn more about the sources of personal information we collect in "WHAT INFORMATION DO WE COLLECT?"

### **How We Use and Share Personal Information**

Learn more about how we use your personal information in the section, <u>"HOW DO WE PROCESS YOUR INFORMATION?"</u>

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Learn more about how we disclose personal information in the section, "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?"

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be the "selling" of your personal information.

We have not disclosed, sold, or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. We will not sell or share personal information in the future belonging to website visitors, users, and other consumers.

### **Your Rights**

You have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- Right to know whether or not we are processing your personal data
- Right to access your personal data
- Right to correct inaccuracies in your personal data
- Right to request the deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to non-discrimination for exercising your rights
- Right to opt out of the processing of your personal data if it is used for targeted advertising (or sharing as defined under California's privacy law), the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

Depending upon the state where you live, you may also have the following rights:

- Right to access the categories of personal data being processed (as permitted by applicable law, including Minnesota's privacy law)
- Right to obtain a list of the categories of third parties to which we have disclosed personal data (as permitted by applicable law, including California's and Delaware's privacy law)
- Right to obtain a list of specific third parties to which we have disclosed personal data (as permitted by applicable law, including Minnesota's and Oregon's privacy law)
- Right to review, understand, question, and correct how personal data has been profiled (as permitted by applicable law, including Minnesota's privacy law)
- Right to limit use and disclosure of sensitive personal data (as permitted by applicable law, including California's privacy law)
- Right to opt out of the collection of sensitive data and personal data collected through the operation of a voice or facial recognition feature (as permitted by applicable law, including Florida's privacy law)

### **How to Exercise Your Rights**

To exercise these rights, you can update and access by emailing us at <a href="mailto:seniorsavingsapp@gmail.com">seniorsavingsapp@gmail.com</a>, or by referring to the contact details at the bottom of this document.

Under certain US state data protection laws, you can designate an authorized agent to make a request on your behalf. We may deny a request from an authorized agent that does not submit proof that they

# 10. DO WE MAKE UPDATES TO THIS NOTICE?

## **Request Verification**

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. We will only use personal information provided in your request to verify your identity or authority to make the request. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes.

If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request and the agent will need to provide a written and signed permission from you to submit such request on your behalf.

#### **Appeals**

Under certain US state data protection laws, if we decline to take action regarding your request, you may appeal our decision by emailing us at <a href="mailto:seniorsavingsapp@gmail.com">seniorsavingsapp@gmail.com</a>. We will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may submit a complaint to your state attorney general.

## 11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at <a href="mailto:seniorsavingsapp@gmail.com">seniorsavingsapp@gmail.com</a> or contact us by post at:

#### **Senior Savings**

792 Brittain Drive Atlanta, GA 30332 United States

# 12. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

You have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information by going to account settings within the app.

You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please go to account settings within the app