Privacy Policy

Last updated: November 09, 2026

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal Data to provide and improve the Service. We collect, use, and disclose Your information as described in this Privacy Policy and, where required by applicable law, only where We have a valid legal basis to do so, including Your consent (where consent is required).

Interpretation and Definitions

Interpretation

The words whose initial letters are capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

Account means a unique account created for You to access Our Service or parts of Our Service.

Affiliate means an entity that controls, is controlled by, or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.

Business, for the purposes of the CCPA/CPRA, refers to the Company as the legal entity that collects Consumers' personal information, or on behalf of which such information is collected, and that alone, or jointly with others, determines the purposes and means of the processing of Consumers' personal information, and that does business in the State of California.

CCPA and/or **CPRA** refers to the California Consumer Privacy Act (the "CCPA") as amended by the California Privacy Rights Act of 2020 (the "CPRA").

Company (referred to as either "the Company", "We", "Us" or "Our" in this Privacy Policy) refers to Yoke Training System Inc. , 17700 Serene Dr Morgan Hill CA 95037.

For the purposes of the GDPR, the Company is the Data Controller.

Consumer, for the purpose of the CCPA/CPRA, means a natural person who is a California resident. A resident, as defined in the law, includes (1) every individual who is in the State of California for other than a temporary or transitory purpose, and (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose.

Cookies are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website, among its many uses.

Country/State refers to: California, United States.

Data Controller, for the purposes of the GDPR (General Data Protection Regulation), refers to the Company as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data.

Device means any device that can access the Service, such as a computer, a cell phone or a digital tablet.

Do Not Track (DNT) is a concept that has been promoted by U.S. regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing Internet users to control the tracking of their online activities across websites.

GDPR refers to the EU General Data Protection Regulation.

Personal Data (or "Personal Information") is any information that relates to an identified or identifiable individual.

For the purposes of GDPR, Personal Data means any information relating to You such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

For the purposes of the CCPA/CPRA, Personal Data means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with You.

We use "Personal Data" and "Personal Information" interchangeably unless a law uses a specific term.

Service refers to the Website.

Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.

For the purposes of the GDPR, Service Providers are considered Data Processors.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

User means any individual who accesses or uses the Service.

Website refers to Spa Life HQ, accessible from www.deniselocsin.com.

You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Under GDPR, You can be referred to as the Data Subject since You are the individual using the Service.

Collecting and Using Your Personal Information

Types of Data Collected

Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City

Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of Our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device's unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit Our Service or when You access the Service by or through a mobile device.

Tracking Technologies and Cookies

We use tracking technologies (such as cookies) to track the activity and to improve Our Service. The technologies We use may include:

Cookies or Browser Cookies. A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being

sent. However, if You do not accept Cookies, You may not be able to use some parts of Our Service.

Web Beacons. Certain sections of Our Service may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Email Tracking Technologies. Our emails may contain similar technologies that tell Us whether an email has been opened or a link within it has been clicked. We use this information to measure the performance of Our email communications, to maintain email deliverability, and to understand which content is of interest to You. You can prevent most email tracking by configuring Your email client to block the automatic loading of remote images, and You may opt out of marketing emails entirely by using the unsubscribe link in any marketing email We send.

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

Where required by law, We use non-essential cookies (that is, Cookies other than the Necessary / Essential Cookies described below) only with Your consent. You can withdraw or change Your consent at any time using Our cookie preferences tool (if available) or through Your browser/device settings. Withdrawing consent does not affect the lawfulness of processing based on consent before its withdrawal.

We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify whether users have accepted the use of cookies on the Website and record the consent choices You have made, so that We can honor those choices on future visits.

Functionality Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow Us to remember choices You make when You use the Website, such as remembering Your Account login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter Your preferences every time You use the Website.

Use of Your Personal Data

The Company may use Personal Data for the following purposes:

To provide and maintain Our Service, including to monitor the usage of Our Service.

To manage Your Account: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.

For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.

To contact You: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.

To provide You with news, special offers, and general information about other goods, services and events which We offer that are similar to those that You have already purchased or inquired about. We send such marketing communications only where permitted by applicable law: where prior consent is required (for example, under the laws applicable in the EEA and the UK), We will send them only with Your consent; otherwise, We may send them until You opt out. You may opt out or withdraw Your consent at any time by using the unsubscribe link in any marketing email We send or by contacting Us.

To manage Your requests: To attend and manage Your requests to Us.

For business transfers: We may use Your Personal Data 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 Data held by Us about Our Service users is among the assets transferred.

For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of Our promotional

campaigns, and evaluating and improving Our Service, products, services, marketing and Your experience.

We may share Your Personal Data in the following situations:

- **With Service Providers:** We may share Your Personal Data with Service Providers to monitor and analyze the use of Our Service, for payment processing, and to contact You.
- **For business transfers:** We may share or transfer Your Personal Data 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.
- **With Affiliates:** We may share Your Personal Data with Our affiliates, in which case We will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With other users:** If Our Service offers public areas, when You share Personal Data or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside the Service.
- **With Your consent**: We may disclose Your Personal Data for any other purpose with Your consent.

Text Messages Privacy Notice

You have the option to receive text (SMS) messages from Us. If You opt in to text messages, We will send You updates, notifications, and other communications as described below. When You opt in, We will collect and store the information You provide in connection with text messaging, such as Your phone number, the date and method of Your consent, and message delivery and read information.

No mobile information will be shared with or sold to third parties or affiliates for marketing or promotional purposes. The phone numbers and consent records We collect for texting are never shared with anyone for any purpose, except the Service Providers that technically have to handle them to deliver the texts.

Consent to receive text messages is not a condition of any purchase or use of Our Service. If You consent to receive SMS from Us, You agree to receive text messages from Us related to:

- Customer care and support
- Account notifications, such as activity, status, or renewal reminders
- Delivery notifications and updates on the status of a delivery
- Authentication messages, such as one-time passwords (OTP) and passcodes
- Security alerts, such as suspicious login attempts or unusual account activity
- Marketing and promotional offers, discounts, and other promotional content

Reply STOP to opt-out. Reply HELP for support. Message & data rates may apply. Messaging frequency may vary. Carriers are not liable for delayed or undelivered messages.

Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with Our legal obligations (for example, if We are required to retain Your data to comply with applicable laws), resolve disputes, and enforce Our legal agreements and policies.

Where possible, We apply shorter retention periods and/or reduce identifiability by deleting, aggregating, or anonymizing data. Unless otherwise stated, the retention periods below are maximum periods ("up to") and We may delete or anonymize data sooner when it is no longer needed for the relevant purpose. We apply different retention periods to different categories of Personal Data based on the purpose of processing and legal obligations:

Account Information

- User Accounts: retained for the duration of Your Account relationship plus up to 24 months after account closure to handle any post-termination issues or resolve disputes.

Customer Support Data

- Support tickets and correspondence: up to 24 months from the date of ticket closure to resolve follow-up inquiries, track service quality, and defend against potential legal claims.
- Chat transcripts: up to 24 months for quality assurance and staff training purposes.

Usage Data

Website analytics data (cookies, IP addresses, device identifiers): up to 24 months from the date of collection, which allows us to analyze trends while respecting privacy principles.

Server logs (IP addresses, access times): up to 24 months for security monitoring and troubleshooting purposes.

Marketing Data

- Email Marketing: retained until You unsubscribe or up to 24 months from Your last engagement (last email opened or clicked), whichever comes first.

Financial and Transaction Data

- Payment information: credit/debit card details are not stored on Our servers; they are processed by Our Payment Service Providers. We retain transaction records

(invoice details, purchase history, amounts) for up to 10 years from the date of transaction to comply with tax laws and financial regulations.

- Billing and invoice records: up to 10 years to meet accounting and tax compliance requirements.

Usage Data is retained in accordance with the retention periods described above, and may be retained longer only where necessary for security, fraud prevention, or legal compliance.

We may retain Personal Data beyond the periods stated above for different reasons:

- Legal obligation: We are required by law to retain specific data (e.g., financial records for tax authorities).
- Legal claims: Data is necessary to establish, exercise, or defend legal claims.
- Your explicit request: You ask Us to retain specific information.
- Technical limitations: Data exists in backup systems that are scheduled for routine deletion.

You may request information about how long We will retain Your Personal Data by contacting Us.

When retention periods expire, We securely delete or anonymize Personal Data according to the following procedures:

- Deletion: Personal Data is removed from Our systems and no longer actively processed.
- Backup retention: Residual copies may remain in encrypted backups for a limited period consistent with Our backup retention schedule and are not restored except where necessary for security, disaster recovery, or legal compliance.
- Anonymization: In some cases, We convert Personal Data into anonymous statistical data that cannot be linked back to You. This anonymized data may be retained indefinitely for research and analytics.

Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. This means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of Your jurisdiction.

Where required by applicable law, We will ensure that international transfers of Your Personal Data are subject to appropriate safeguards and, where relevant, supplementary measures. The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place, including the security of Your data and other personal information.

Delete Your Personal Data

You have the right to delete or request that We assist in deleting the Personal Data that We have collected about You.

Our Service may give You the ability to delete certain information about You from within the Service.

You may update, amend, or delete Your information at any time by signing in to Your Account, if You have one, and visiting the account settings section that allows You to manage Your personal information. You may also contact Us to request access to, correct, or delete any Personal Data that You have provided to Us.

Please note, however, that We may need to retain certain information when We have a legal obligation or lawful basis to do so.

Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law Enforcement

Under certain circumstances, the Company may disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other Legal Requirements

The Company may disclose Your Personal Data in the good-faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While We strive to use commercially reasonable means to protect Your Personal Data, We cannot guarantee its absolute security.

Detailed Information on the Processing of Your Personal Data

The Service Providers We use may have access to Your Personal Data. These third-party vendors collect, store, use, process and transfer information about Your activity on Our Service in accordance with their Privacy Policies.

Where required by applicable law (including in the EEA and the UK), We deploy the non-essential cookies and similar technologies used by Our Service Providers, as described in this section, only with Your prior consent, and You may withdraw that consent at any time as described in the "Tracking Technologies and Cookies" section. The opt-out tools, links, and browser add-ons referenced in this section are additional choices made available to You; they do not replace, and are not a substitute for, Your right to give or withdraw consent where consent is required.

Email Marketing

We may use Your Personal Data to contact You with newsletters, marketing or promotional materials and other information that may be of interest to You. You may opt out of receiving any, or all, of these communications from Us by following the unsubscribe link or instructions provided in any email We send or by contacting Us.

We may use Email Marketing Service Providers to manage and send emails to You.

Kartra

Their Privacy Policy can be viewed at https://kartra.com/privacy-policy/

Payments

We may provide paid products and/or services within the Service. In that case, We may use third-party services for payment processing (e.g. payment processors).

We will not store or collect Your payment card details. That information is provided directly to Our third-party payment processors whose use of Your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

Stripe

Their Privacy Policy can be viewed at https://stripe.com/us/privacy

Shopify

Their Privacy Policy can be viewed at https://www.shopify.com/legal/privacy

GDPR Privacy

Legal Basis for Processing Personal Data under GDPR

We may process Personal Data under the following conditions:

- **Consent:** You have given Your consent for processing Personal Data for one or more specific purposes.
- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- **Vital interests:** Processing Personal Data is necessary in order to protect Your vital interests or those of another natural person.
- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.
- **Legitimate interests:** Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

The legal basis We rely on depends on the purpose of the processing:

- **Performance of a contract:** creating and administering Your Account, providing and maintaining the Service, processing purchases and payments, and providing customer support.
- **Legitimate interests:** securing the Service and preventing fraud and abuse; monitoring, analyzing, and improving the Service; sending non-marketing service communications; enforcing Our agreements and establishing, exercising, or defending legal claims; and evaluating or completing business transfers. Where We rely on legitimate interests, Our interest is the effective, secure, and commercially sustainable operation and improvement of the Service, and We balance that interest against Your rights and freedoms.
- **Consent:** sending marketing communications where consent is required; placing and reading non-essential cookies and similar technologies, as described in the "Tracking Technologies and Cookies" section, where consent is required;
- **Legal obligation:** retaining transaction, tax, and accounting records, and responding to lawful requests from courts and public authorities.

Where the provision of Personal Data is a statutory or contractual requirement, or necessary to enter into a contract with Us, We will make this clear at or before the point of collection, including whether You are obliged to provide the Personal Data and the possible consequences of not providing it. If You have questions about the legal basis for any specific processing activity, please contact Us.

International Transfer of Personal Data

We may transfer, store, and process Personal Data in countries other than the country in which You are located, including countries outside the European Economic Area ("EEA") and the United Kingdom ("UK"), where data protection laws may differ.

Where We transfer Personal Data outside the EEA/UK to a country that has not been recognized as providing an adequate level of protection, We rely on appropriate safeguards, such as:

- Transfers to countries that the European Commission or the UK Government has decided provide an adequate level of data protection, including, for transfers to the United States, recipients certified under the EU-U.S. Data Privacy Framework (and its UK Extension), where applicable
- The European Commission's Standard Contractual Clauses ("SCCs") and/or the UK International Data Transfer Agreement ("IDTA") or the UK Addendum to the SCCs (as applicable)
- Supplementary measures where appropriate, such as encryption in transit and at rest, access controls, data minimization, and vendor security reviews.

We transfer Personal Data internationally only as needed to provide the Service and to work with Our Service Providers (for example, hosting, analytics, email delivery). You may contact Us using the details in the "Contact Us" section of Our Privacy Policy to request further information about the safeguards We use for international transfers, including copies of relevant contractual protections (redacted where necessary).

Your Rights under the GDPR

The Company undertakes to respect the confidentiality of Your Personal Data and to guarantee You can exercise Your rights.

You have the right under this Privacy Policy, and by law where the GDPR or the UK GDPR applies to Our processing of Your Personal Data (including, in particular, if You are in the European Economic Area (EEA) or the United Kingdom (UK)), to:

- **Request access to Your Personal Data.** The right to access, update or delete the information We have on You. Where possible, You can access, update or request deletion of Your Personal Data directly within Your Account settings section. If You are unable to perform these actions yourself, please contact Us to assist You. This also enables You to receive a copy of the Personal Data We hold about You.
- **Request restriction of processing.** You have the right to ask Us to restrict processing of Your Personal Data in certain circumstances (for example, while We verify accuracy or consider an objection).
- **Request correction of the Personal Data that We hold about You.** You have the right to have any incomplete or inaccurate information We hold about You corrected.
- **Object to processing of Your Personal Data.** This right exists where We are relying on a legitimate interest as the legal basis for Our processing and there is something about Your particular situation that makes You want to object to Our processing of Your Personal Data on this ground. You also have the right to object where We are processing Your Personal Data for direct marketing purposes.

- **Request erasure of Your Personal Data.** You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.
- **Request the transfer of Your Personal Data.** We will provide to You, or to a third-party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which You initially provided consent for Us to use or where We used the information to perform a contract with You.
- **Withdraw Your consent.** You have the right to withdraw Your consent to Our use of Your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to certain specific functionalities of the Service.

Exercising of Your GDPR Data Protection Rights

You may exercise any of the rights described above by contacting Us. Please note that We may ask You to verify Your identity before responding to such requests. If You make a request, We will try Our best to respond to You as soon as possible. We generally respond within one month, and may extend by two further months where necessary, in accordance with applicable law.

You have the right to complain to a supervisory authority about Our collection and use of Your Personal Data. If You are in the EEA, please contact Your local data protection authority. If You are in the UK, You can complain to the Information Commissioner's Office (ICO).

Automated Decision-Making

We do not make decisions based solely on automated processing, including profiling, that produce legal effects concerning You or similarly significantly affect You. If this changes, We will update this Privacy Policy and provide the information and safeguards required by the GDPR.

CCPA/CPRA Privacy Notice (California Privacy Rights)

This privacy notice section for California residents supplements the information contained in Our Privacy Policy and it applies solely to visitors, users, and others who reside in the State of California.

Categories of Personal Information Collected

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or Device. The following is a list of categories of personal information which We may collect or may have collected from California residents within the last twelve (12) months.

The categories and examples provided in the list below are those defined in the CCPA/CPRA. Listing a category does not mean that every type of information it describes was in fact collected by Us. It means only that, to the best of Our knowledge, some information within that category may be, or may have been, collected. Certain categories would be collected only if You provided that information to Us directly.

Category A: Identifiers.

Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers.

Collected: Yes.

Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).

Examples: A name, signature, 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.

Some personal information included in this category may overlap with other categories.

Collected: Yes.

Category C: Protected classification characteristics under California or federal law.

Examples: 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).

Collected: No.

Category D: Commercial information.

Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Collected: Yes.

Category E: Biometric information.

Examples: 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.

Collected: No.

Category F: Internet or other similar network activity.

Examples: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

Collected: Yes.

Category G: Geolocation data.

Examples: Approximate physical location, physical location or movements.

Collected: No.

Category H: Sensory data.

Examples: Audio, electronic, visual, thermal, olfactory, or similar information.

Collected: No.

Category I: Professional or employment-related information.

Examples: Current or past job history or performance evaluations.

Collected: No.

Category J: Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).

Examples: 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.

Collected: No.

Category K: Inferences drawn from other personal information.

Examples: A profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Collected: No.

Category L: Sensitive personal information.

Examples: Government-issued identifying numbers; a Consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; genetic data; neural data; precise geolocation; racial or ethnic origin; religious or philosophical beliefs; union membership; the contents of mail, email, and text messages (unless the Business is the intended recipient); biometric data; health data; and sexual orientation or sex life.

Collected: No.

Under CCPA/CPRA, Personal Information does not include:

- Publicly available information, meaning: information lawfully made available from federal, state, or local government records; information that the Business has a reasonable basis to believe is lawfully made available to the general public by the Consumer or from widely distributed media; or information made available by a person to whom the Consumer has disclosed it, unless the Consumer restricted the information to a specific audience
- Deidentified or aggregated consumer information
- Information excluded from the CCPA/CPRA's scope, such as:
    - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data
    - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994

Sources of Personal Information

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

- **Directly from You**. For example, from the forms You complete on Our Service, from preferences You express or provide through Our Service, or from Your purchases on Our Service.
- **Indirectly from You**. For example, from observing Your activity on Our Service.
- **Automatically from You**. For example, through cookies We or Our Service Providers set on Your Device as You navigate through Our Service.
- **From Service Providers**. For example, third-party vendors for payment processing, or other third-party vendors that We use to provide the Service to You.

Use of Personal Information

We may use or disclose Personal Information We collect for "business purposes" or "commercial purposes" (as defined under the CCPA/CPRA), which may include the following examples:

- To operate Our Service and provide You with Our Service.
- To provide You with support and to respond to Your inquiries, including to investigate and address Your concerns and monitor and improve Our Service.
- To fulfill or meet the reason You provided the information. For example, if You share Your contact information to ask a question about Our Service, We will use that personal information to respond to Your inquiry. If You provide Your personal information to

purchase a product or service, We will use that information to process Your payment and facilitate delivery.

- 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/CPRA.
- For internal administrative and auditing purposes.
- To detect security incidents and protect against malicious, deceptive, fraudulent or illegal activity, including, when necessary, to prosecute those responsible for such activities.
- Other purposes consistent with the context in which the information was collected, or as otherwise disclosed to You at the time of collection.

Please note that the examples provided above are illustrative and not intended to be exhaustive. For more details on how We use this information, please refer to the "Use of Your Personal Information" section.

If We decide to collect additional categories of Personal Information or use the Personal Information We collected for materially different, unrelated, or incompatible purposes, We will update this Privacy Policy.

Disclosure of Personal Information

We may use or disclose and may have used or disclosed in the last twelve (12) months the following categories of Personal Information for business or commercial purposes:

- Category A: Identifiers
- Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- Category D: Commercial information
- Category F: Internet or other similar network activity

The categories listed above are those defined in the CCPA/CPRA. Listing a category does not mean that every type of information it describes was in fact disclosed. It means only that, to the best of Our knowledge, some information within that category may be, or may have been, disclosed.

When We disclose Personal Information to a Service Provider or contractor for a business purpose, We enter into a contract that describes the purpose, requires the recipient to keep that Personal Information confidential, and prohibits the recipient from using it for any purpose other than the limited and specified purposes stated in the contract, consistent with the CCPA/CPRA.

Categories of Recipients to Whom We Disclose Personal Information

We may disclose, and may have disclosed in the preceding twelve (12) months, the categories of Personal Information identified below to the following categories of recipients for the business purposes described in this Privacy Policy:

- **Category A: Identifiers** — Service Providers, Our affiliates, and third-party vendors to whom You or Your agents authorize Us to disclose Personal Information in connection with products or services We provide to You.
- **Category B: Personal information categories listed in the California Customer Records statute** — Service Providers, Our affiliates, and third-party vendors to whom You or Your agents authorize Us to disclose Personal Information in connection with products or services We provide to You.
- **Category D: Commercial information** — Payment processors, Service Providers, Our affiliates, and third-party vendors to whom You or Your agents authorize Us to disclose Personal Information in connection with products or services We provide to You.
- **Category F: Internet or other similar network activity** — Service Providers, including analytics providers, Our affiliates, and third-party vendors to whom You or Your agents authorize Us to disclose Personal Information in connection with products or services We provide to You.

Sale or Sharing of Personal Information

As defined in the CCPA/CPRA, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a Consumer's personal information by the Business to a third party for valuable consideration. This means that We may have received some kind of benefit in return for sharing personal information, but not necessarily a monetary benefit.

As defined in the CCPA/CPRA, "share" and "sharing" mean disclosing, making available, or otherwise communicating a Consumer's personal information by the Business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.

We have not sold or shared Personal Information of California residents in the preceding twelve (12) months, and We do not sell or share Personal Information as those terms are defined in the CCPA/CPRA. We disclose Personal Information to Service Providers and contractors under written contracts that restrict their use of that information, and otherwise only as described in this Privacy Policy and as permitted by the CCPA/CPRA.

Retention of Personal Information

We retain California residents' Personal Information for as long as reasonably necessary to achieve the purposes described in this Privacy Policy (including the purposes disclosed in this CCPA/CPRA notice), taking into account: (i) how long We need the information to provide and maintain the Service and Your Account; (ii) whether You have requested deletion (subject to applicable exceptions); (iii) Our legal, tax, accounting, and regulatory

obligations; (iv) security, fraud prevention, and abuse monitoring needs; and (v) the time periods needed to resolve disputes and enforce Our agreements.

Specific retention periods for major data categories are described in the "Retention of Your Personal Information" section of Our Privacy Policy, and We may retain certain information longer where required or permitted by law (for example, to comply with recordkeeping obligations or to establish, exercise, or defend legal claims).

Personal Information of Minors Under 16 Years of Age

We do not knowingly collect personal information from minors under the age of 16 through Our Service, although certain third-party websites that We link to may do so. These third-party websites have their own terms of use and privacy policies and We encourage parents and legal guardians to monitor their children's Internet usage and instruct their children to never provide information on other websites without their permission.

We do not sell the Personal Information of Consumers We actually know are less than 16 years of age, unless We receive affirmative authorization (the "right to opt-in") from the parent or guardian of a Consumer less than 16 years of age. Consumers who opt-in to the sale of Personal Information 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 Us by contacting Us.

If You have reason to believe that a child under the age of 16 has provided Us with personal information, please contact Us with sufficient detail to enable Us to delete that information.

Your Rights under the CCPA/CPRA

The CCPA/CPRA provides California residents with specific rights regarding their personal information. If You are a resident of California, You have the following rights:

- **The right to notice.** You have the right to be notified which categories of Personal Information are being collected and the purposes for which the Personal Information is being used.
- **The right to know/access.** Under CCPA/CPRA, You have the right to request that We disclose information to You about Our collection, use, sale, disclosure for business purposes and sharing of personal information. Once We receive and confirm Your request, 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 purposes for collecting or selling that personal information
    - The categories of third parties with whom We share that personal information
    - The specific pieces of personal information We collected about You

- If We sold Your Personal Information or disclosed Your Personal Information for a business purpose, We will disclose to You:
    - The categories of personal information sold
    - The categories of personal information disclosed

- **The right to say no to the sale or sharing of Personal Information (opt-out).** You have the right to direct Us to not sell Your personal information. To submit an opt-out request, please see the "Do Not Sell or Share My Personal Information" section or contact Us.

- **The right to correct Personal Information.** You have the right to correct or rectify any inaccurate personal information about You that We collected. Once We receive and confirm Your request, We will use commercially reasonable efforts to correct (and direct Our Service Providers to correct) Your personal information, unless an exception applies.

- **The right to limit use and disclosure of sensitive Personal Information.** You have the right to request to limit the use or disclosure of certain sensitive personal information We collected about You, unless an exception applies. To submit a request, please see the "Limit the Use or Disclosure of My Sensitive Personal Information" section or contact Us.

- **The right to delete Personal Information.** You have the right to request the deletion of Your Personal Information under certain circumstances, subject to certain exceptions. Once We receive and confirm Your request, We will delete (and direct Our Service Providers to delete) Your Personal Information from Our records, unless an exception applies. We may deny Your deletion request if retaining the information is necessary for Us or Our Service Providers to:
    - Complete the transaction for which We collected the Personal Information, provide a good or service that You requested, take actions reasonably anticipated within the context of Our ongoing business relationship with You, or otherwise perform Our contract with You.
    - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
    - Debug products to identify and repair errors that impair existing intended functionality.
    - Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
    - Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.).
    - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the

information's deletion may likely render impossible or seriously impair the research's achievement, if You previously provided informed consent.

- Enable solely internal uses that are reasonably aligned with consumer expectations based on Your relationship with Us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which You provided it.

- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of Your consumer rights, including by:
  - Denying goods or services to You
  - Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
  - 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

Exercising Your CCPA/CPRA Data Protection Rights

Please see the "Do Not Sell or Share My Personal Information" section and "Limit the Use or Disclosure of My Sensitive Personal Information" section for more information on how to opt out and limit the use of sensitive information collected.

Additionally, in order to exercise any of Your rights under the CCPA/CPRA, and if You are a California resident, You can contact Us:

- By email: hello@deniselocsin.com

We may verify Your identity before responding to requests to know, delete, or correct Personal Information, as permitted or required by applicable law. We will not require You to submit a verifiable consumer request to opt out of the sale or sharing of Personal Information or to limit the use or disclosure of Sensitive Personal Information. For those requests, We may ask only for information reasonably necessary to identify the Personal Information to which the request applies and process the request.

Only You or an authorized agent acting on Your behalf may make a verifiable request relating to Your Personal Information.

Your request to Us must:

- Provide sufficient information that allows Us to reasonably verify You are the person about whom We collected Personal Information or an authorized representative
- Describe Your request with sufficient detail that allows Us to properly understand, evaluate, and respond to it

We cannot respond to Your request or provide You with the required information if We cannot:

- Verify Your identity or authority to make the request; and
- Confirm that the personal information relates to You

No later than 10 business days after receiving a request to know, delete, or correct, We will confirm receipt and provide general information about how We will process and verify the request and when You should expect a response, unless We have already granted or denied the request. We will respond no later than 45 calendar days after receipt. If reasonably necessary, We may extend the response period once by an additional 45 calendar days. If We do, We will notify You during the initial 45-day period and explain the reason for the extension.

Unless You request a longer period, Our response to a request to know will cover the preceding 12 months. You may request information collected on or after January 1, 2022, for a longer period, unless providing it is impossible or requires disproportionate effort. We are not required to retain Personal Information for any specific period.

For data portability requests, We will select a format to provide Your personal information that is readily usable and should allow You to transmit the information from one entity to another entity without hindrance.

Do Not Sell or Share My Personal Information

We have not sold or shared Personal Information of California residents in the preceding twelve (12) months, and We do not sell or share Personal Information as those terms are defined in the CCPA/CPRA.

If Our practices change, We will update this Privacy Policy, provide the required "Do Not Sell or Share My Personal Information" link and opt-out methods, and honor opt-out preference signals such as the Global Privacy Control (GPC).

Limit the Use or Disclosure of My Sensitive Personal Information

We do not collect or use sensitive Personal Information for purposes other than those specified in the CCPA/CPRA and its implementing regulations, and We do not collect or process sensitive Personal Information for the purpose of inferring characteristics about consumers. Accordingly, We are not required to provide, and do not provide, a method for submitting requests to limit the use or disclosure of sensitive Personal Information. If Our practices change, We will update this Privacy Policy and provide the required means to exercise this right.

"Do Not Track" Policy as Required by California Online Privacy Protection Act (CalOPPA)

Our Service does not respond to Do Not Track signals.

However, some third-party websites do keep track of Your browsing activities. If You are visiting such websites, You can set Your preferences in Your web browser to inform websites

that You do not want to be tracked. You can enable or disable DNT by visiting the preferences or settings page of Your web browser.

Your California Privacy Rights (California's Shine the Light law)

Under California Civil Code § 1798.83 (California's Shine the Light law), California residents with an established business relationship with Us can request information once a year about sharing their Personal Data with third parties for the third parties' direct marketing purposes.

We do not disclose California customers' Personal Information to third parties for those third parties' own direct marketing purposes.

California Privacy Rights for Minor Users (California Business and Professions Code Section 22581)

California Business and Professions Code Section 22581 allows California residents under the age of 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted.

To request removal of such data, and if You are a California resident, You can contact Us using the contact information provided below, and include the email address associated with Your Account.

Be aware that Your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

Children's and Minors' Privacy

The Service is not directed to, and We do not knowingly collect Personal Information from, anyone under the age of 16.

If You are a parent or guardian and You believe Your child has provided Us with Personal Information, please contact Us. If We become aware that We have collected Personal Information from anyone under the age of 16, We will take steps to remove that information from Our servers as soon as reasonably possible.

Some countries and states set a higher age at which an individual can consent to the processing of their own Personal Information. Where We rely on consent as a legal basis and the law applicable to a User sets an age higher than 16, We may require the consent of that User's parent or guardian before We collect and use their Personal Information.

Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third-party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If You have any questions about this Privacy Policy, You can contact Us:

- By email: hello@deniselocsin.com