

## PRIVACY POLICY

**This Privacy Policy was last revised on: 11.11.19**

Protecting your privacy is important to us. Although privacy regulations require website and app owners and providers to inform you of their practices regarding the collection and use of your personal information, we strive to safeguard your privacy as you use our Sites.

This Privacy Policy explains how we may collect, use, protect, and disclose your personal information. By visiting, accessing, or using our Sites, you consent to the terms and practices described in this Privacy Policy.

This Privacy Policy also applies to any “Supplemental Privacy Policy” that links to this Privacy Policy or refers to the Privacy Policy for this Website.

We may change this Privacy Policy from time to time. Please check back periodically for up-to-date information about our privacy practices.

### **1. Definitions**

The following terms used in this Privacy Policy mean and refer to the following:

<u>Terms</u>	<u>Definitions</u>
“we,” “us,” and “our”:	USC Village, the University of Southern California, their subsidiaries and affiliates, and each of their officers, directors, employees, and agents.
“Website”:	The website that has its top level domain (TLD) web address or uniform resource locator (URL) at <b>www.uscvillage.com</b> , and all subdomains and sub-directories under that top level domain (including any blog pages and subpages).
“app” or “apps”:	Mobile applications, web applications, online applications, and smartphone applications.
“Site” or “Sites”:	(i) Our Website; (ii) any apps that we develop or operate to allow direct access to our Website without a web or internet browser, or to allow access to the same services we directly provide on our Website; (iii) any emails, text messages, online chats, or electronic communication that we use to advertise, promote, or communicate about our Website, any of the apps described in (ii), or any services we provide through either; (iv) any digital ads we develop or use to directly advertise, promote, or communicate about our Website, any of the apps described in (ii), or any services we provide through either; (v) any social media accounts that we own or operate on third-party platforms to directly advertise, promote, or communicate about our Website, any of the apps described in (ii), or any services we provide through either; and (vi) any digital ads (e.g., banner ads) that we develop or operate to directly advertise, promote, or communicate about our Website, any of the apps described in (ii), or any services we provide through either.

## **2. Types of Information We Collect and How We Collect Them**

Our Sites collect information about you to provide and improve our services, communicate offers that we believe will interest you, and to administer our business.

### **Information You Provide to Us**

We collect personal information or personally identifiable information (PII) from you when you submit that information to us voluntarily. You can choose not to provide certain information, but you may not be able to take advantage of some of our services and features. For example, we collect information from you when you:

- place an order through a Site
- create an account on a Site
- participate in any loyalty or reward programs, promotions, sweepstakes, or contests that third party retailers may offer through our Sites (such as our “Loyalty Club” program)
- sign up to receive newsletters or other notices about events, giveaways, promotions, and similar programs
- communicate with our customer service or participate in any online surveys
- tag or link us or a Site on any photo or other content on a third party social network you post
- post a review, question, answer, or other information on a Site
- download our mobile applications or third-party mobile applications that interact with our Sites

The personal information we collect from you may include:

- your name
- business name
- type of business
- email address
- mailing or postal address
- phone number
- reason for contact
- any other information you voluntarily provide on or through a Site

Collecting this information allows us to communicate with you, respond to any questions or comments you provide, and provide personalized interactions. If we ask for such information from you, we will either tell you how we will use the information or we will use it in conformity with this Privacy Policy.

We only collect PII that you provide through the Site, and retain your PII for no more than 6 months after you have closed your account with us, opted out of any loyalty, reward or similar programs, or opted out or unsubscribed from any e-newsletter program, except that we may keep certain information you provide for a longer duration for archival purposes.

### **Information We Receive from Third Party Sources**

We may collect information about you from third parties. Such information may include demographic data (like the number of members of your household, age, and gender) and purchase preference information. We may use this information to supplement or update our records, improve the quality or personalization of our communications to you, and help prevent or detect fraud.

### **Automated Information Collection**

We automatically receive and store certain types of information when you interact with our Sites (including emails and online advertisements). This information helps us to make our Sites work more

efficiently, evaluate use of our Sites, and support our website analytics and marketing campaigns or promotions. Some of the types of information we may automatically receive include:

- Technical information, such as the Internet Protocol (IP) address of your device, your device type and operating system, your browser type, your referring website's address, your clicks or clickstream through our Sites, the temporary or persistent unique device identifier (UDID) placed by us or our service providers, and the unique identifier assigned by us or our service providers to your device.
- Cookies that recognize you as you use, access, or return to our Sites (see more information about cookies below).
- Web beacons that allow us to know what pages on our Sites have been visited, what emails have been opened, and if our banner ads have been effective.

Our Site may also collect information about the location of your device. For example, the IP address of your device may reveal information about your approximate location. Your device should require you to provide permission before our Site obtains precise geolocation information from a browser's geolocation application programming interface (API) or from technologies like Global Positioning System (GPS) technologies, Wi-Fi, or cell towers. We and our service providers may use this approximate location or precise geolocation information, along with other information you submit, to provide you with location-based services like local store information, search results, special offers, and other personalized content.

Most browsers and mobile devices allow users to enable or disable precise geolocation using pop-ups or controls located in the settings menu. If you have questions about how to disable your device's precise geolocation services, please contact your browser developer, mobile service carrier, or device manufacturer. You may also be able to stop collection of precise geolocation information by our mobile application by uninstalling the mobile application using the standard uninstall process available as part of your mobile device. If you uninstall our mobile application from your device, the unique identifier associated with your device may continue to be stored. If you re-install our mobile application on the same device, we may be able to re-associate this identifier to your previous transactions.

#### More About Cookies

Our Sites use cookies. Cookies are small text files or pieces of information that a website or email saves or transfers to your browser and stores on your hard drive. We use cookies to track your preferences and interactions as you navigate through our Sites and to save you from having to re-enter information every time you visit a Site.

Cookies allow the Sites to provide you with a more continuous and personalized user experience. Cookies may also enable a site's or service provider's system to recognize your browser and capture and remember certain information. They are also used to help us understand your preferences based on previous or current Site activity, which enables us to provide you with improved services.

We also use cookies to help us compile aggregate data about Site traffic and Site interaction so that we can offer better Site experiences and tools in the future.

We may also use technologies, such as our own cookies, to provide you with personalized online display advertising tailored to your interests. To opt out of our cookies used for this online advertising, please review the opt-out section below.

Our Sites also use cookies to collect statistical information that are anonymous without identifying individual users, and to compile aggregate data about Site traffic and Site interaction. We may maintain

these and similar types of information anonymously and indefinitely for archival purposes and to improve our Sites and user experience.

Most web browsers allow you to exercise control over cookies by deleting them, blocking them, or alerting you when a cookie file is stored. Please review your browser's instructions on these functions. If you choose to disable the cookies feature of your web browser, you may not be able to use some or all of the features provided on our Sites. Even if you disable, block, or delete cookies, it is possible that not all of the tracking described in this Privacy Policy will be stopped.

#### Our Internet-Based Advertising on Third-Party Websites and Apps

We collect personal information about users over time and across different websites when you use our Sites. We also have third parties that collect personal information this way. For example, we may use one or more third-party online advertising networks to serve ads on our behalf on third party websites. The third-party ad network may collect information about your visits to our Sites and your interaction with our online ads. For example, it may keep track of how many of our ads you saw before visiting our Sites. This is primarily accomplished using technology such as cookies, action tags, web beacons, or GIF tags which are placed in various places within our Sites and our online ads.

We may share information with third-party ad networks in an aggregate form to help us analyze and improve our Sites and our online ads. The third-party ad networks may use information about your visit to our Sites and other websites in order to provide you with ads about goods and services that may be of interest to you. For example, if you browse for information about a certain retailer or service provider on our Sites or on third party websites, we or the online ad network may show you ads for retailers or service providers who sell or distribute similar types of products or services. To opt out of online ad networks, please review the opt-out section below. If you opt-out of interest-based ads, you may still see our ads on websites you visit, but those ads will not be based on your browsing behavior.

We use Google analytics, advertising, and marketing services to evaluate and analyze the effectiveness of our Internet-based ads on third-party sites. Please see the Google Services section of Privacy Policy to learn more about how we use such services.

Some browsers have a “do not track” feature that lets your browser tell websites that you do not want to have your online activities tracked. These features are not yet uniform, so our Sites may not be currently designed to respond to some or all of those signals.

#### Social Media Widgets and Single Sign-On Services

Our Sites use third party social media widgets such as buttons or similar mechanisms from Facebook, Twitter, and Instagram (we may add social media widgets in the future, such as Pinterest, YouTube, and FourSquare). Such third party features may collect information about you, like your IP address and the page(s) you visit on the Sites. They may also place cookies on your device. These social media widgets are either hosted by a third party or by our Sites. Your interactions with those features are governed by the privacy policies of the third party social media networks that provide them, and we encourage you to review their privacy policies and their terms and conditions.

#### Information We Do Not Collect

We try to limit the information we collect to information that is adequate and relevant for the purpose of providing information about our Sites and services to you, and to allow you to place orders or purchase goods or services from retailers or service providers you might link to through our Sites (we do not sell or transact any retail goods or services directly on our Sites, and encourage you to review the privacy

policies and the terms and conditions of any third party retailers or service providers you link to from our through our Sites)

We do **not** directly collect or request from you any sensitive, personal information on our Sites, such as:

- financial information (bank, financial account, or credit card information)
- social security numbers
- driver license or other government-issued identification numbers
- health insurance or medical identification numbers
- health-related information
- genetic data
- any information about sexual orientation, religious or philosophical beliefs, or political views

If you receive a request for any such type of sensitive, personal information directly on or from our Sites (including any email that you believe to have been sent directly by us), you should avoid disclosing such information and notify us (see the information about how to contact us below).

Although we may link you to a third party retailer or service provider's website or app, we do not own or operate those websites or apps. Before you disclose any financial information to any third party retailer or service provider (whether you link to that retailer or service provider through our Sites or visit their website or mobile application directly), we encourage you to review their privacy policies and their terms and conditions.

#### Minors Under 16 Years Of Age

We do not specifically or intentionally advertise to or collect information from minors under 16 years of age. If you believe that we received any information on or through our Sites that was provided by a person under 16 years of age, please notify us immediately so that we can take steps to remove, delete, and/or protect any such information (see the information about how to contact us below).

### **3. How We Use, Disclose, Or Share Information**

The information we collect on our Sites may be used to fulfill your requests (such as responses to email questions), to support our core business functions (such as internal business process management, authentication, loss and fraud prevention, and public safety functions), and to communicate with you about our services and discount, loyalty, reward or similar programs. When you create an account with us, we offer the opportunity to sign up for our e-newsletters and email lists, so you may receive information about any events happening at USC Village and discount, loyalty, reward or similar programs.

To accomplish these purposes, we may combine information about you that we collect online, on site or on university campuses and grounds, via apps, and from third party sources. We may also transfer or disclose your information within our university subsidiaries and affiliates (including affiliate colleges and schools, and our other university or campus affiliated services and service providers).

We may make third party services, including third party apps, available to you on our Sites. You may choose to allow us to share your information with those third party services. We require such third party services to give you notice of their privacy policy so you can review it before authorizing them to access your information, and we encourage you to review any third party's privacy policy and applicable terms and conditions before authorizing such access.

We may disclose the information we collect about you (including PII) to third parties to comply with applicable laws, regulations, or governmental requests. We may also disclose such information to verify or enforce compliance with our Terms & Conditions and this Privacy Policy, to process any requests or inquiries you make to us, protect against fraud, protect against misuse or unauthorized use of our Sites, or

when we believe in good faith that the law requires such disclosure. We may also disclose such information to a successor entity in connection with a merger, consolidation, sale of assets or other institutional change affecting the Sites.

We may share the information collected on our Sites with agents or contractors who provide support for our internal operations. Such entities may receive PII to allow them to perform their duties, but they may not use that information for any other purpose. In some instances, we may share non-identifying and aggregate information collected on our Sites with third parties, such as retailers and service providers who operate on any of our facilities or grounds.

**We do not sell your PII to any third parties.**

#### **4. Public Forums and Blogs**

Please remember that any information you disclose in public areas of our Sites or the Internet (such as message boards, product reviews, question-and-answer pages, profile pages, and social network features offered by us or by third parties) becomes public information. You should exercise caution when deciding to disclose personal information, location, or similar information in these public areas.

#### **5. Links to Third-Party Sites and Third-Party Content on Our Sites**

To enhance your use of our Sites and to provide other sources of information for user convenience, some pages or areas within our Sites are linked to third-party websites and apps that we do not manage or control. We do not review, control or take responsibility for the content of those sites, and this Privacy Policy does not cover the practices of those websites and apps. In addition, we provide links to third-party sites for convenience only and do not imply endorsement or credibility of service, information or products. We encourage you to review their privacy policies and their terms and conditions before visiting any third-party site and to see how they collect and use information.

We also allow third-party retailers and service providers to supply us with information, photographs, videos, and other content to post on our Sites, or allow them to directly post such information and content on our Sites, to advertise, promote, market or communicate with you about their businesses, products, services, or programs. We do not review, control or take responsibility for such content even if they are posted directly on our Sites. In addition, all such third-party content posted directly on our Sites are provided for convenience only and do not imply endorsement or credibility of service, information or products.

#### **6. How We Protect Information**

Because we do not process credit card payments or collect any financial information on our Sites, we do not use vulnerability or malware scanning to Payment Card Industry Data Security Standard (PCI DSS). But we regularly scan our Sites for malware (viruses and malicious software) and vulnerability (weaknesses that may be known to be exploited by malware).

We also store any personal information behind secured networks that are accessible only by a limited number of persons who have special access rights and are required to keep the information confidential, and we keep sensitive information you supply encrypted using Secure Socket Layer (SSL) technology.

To ensure the security of your personal information, you should always provide that information over a secure connection. You can check the existence of a secure connection in one of two ways:

- Look at the URL in your web browser. Whenever you are connected to a secure server, that connection will be represented in the URL as "https," rather than "http."

- Look at your web browser. You have an SSL connection if you see a closed lock or a solid key. If you click on this image, a small pop-up window displaying website security information will appear.

For any transaction or information processed through a gateway provider that are not stored or processed on our servers, we require all gateway providers to store or process information only on servers that are located within the United States.

We urge you to take steps to protect your own privacy. We recommend that you do not share your Site password(s) with anyone or in any unsolicited phone call or e-mail.

While we strive to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party hackers from illegally obtaining information about you. If you suspect that any personal information that you provided to us on or through our Sites may have been illegally obtained from our Sites, please notify us immediately (see the information about how to contact us below).

## **7. Google Services**

### **Google Analytics and Similar Services to Analyze Our Ads on Third-Party Sites**

We use Google's Analytics and similar technologies and services to track and examine the effectiveness of our ads that we post on third-party websites and apps (including any third-party online advertising networks to serve ads on our behalf on third party sites) by installing ad-based cookies on or in conjunction with those ads. These cookies may track data related to a user's behavior, demographic, interest, and other personal information to remarket our ads and to attract audience to our Sites and also to remarket users on our Sites to third party sites.

Google Analytics may allow us to examine statistical information about the age, gender, and interests of users on our Sites. Although we do not directly request or obtain such information on our Sites, Google Analytics may compile such information from users who access third-party sites that collect such information and use Google ad-based technologies and services (including Google's DoubleClick ad management system and similar technologies and ad-based cookies), and make that information available to us and to anyone else who use Google ad-based technologies and services.

To learn more about Google Analytics and similar services, you may visit Google's Analytics help page at: <https://support.google.com/analytics/answer/3450482?hl=en>. To learn more about Google's advertising technologies, you may visit their advertising policies page at: <https://policies.google.com/technologies/ads>.

Users may opt-out from their data being used by Google Analytics by installing the Google Analytics opt-out browser add-on or plug-in that can be accessed at: <https://tools.google.com/dlpage/gaoptout>.

### **Google AdSense to Serve Third-Party Ads on Our Sites**

We may use Google AdSense to allow user-based advertising by third parties on our Sites from time to time. When we do, Google, as a third-party vendor, may use cookies (including DoubleClick ad management system and similar technology) to publish or post ads on our Sites. Google's use of such cookies enables it to serve ads to our users based on previous visits to our Sites and other sites on the Internet, may track the referring site from which a user clicks onto our Sites and the site onto which a user clicks from our Sites, and may track users interests, demographics and other PII collected through user clicks on ads that appear on our Sites, but also clicks on ads that appear on third-party sites and on any platform that is owned or controlled by Google or its subsidiaries and affiliates.

To learn more about Google AdSense products and services, you may visit Google's AdSense help page at: <https://support.google.com/adsense/answer/6242051?hl=en>.

We encourage you to review Google's privacy policy and terms of service, available at: <https://policies.google.com/privacy> and <https://policies.google.com/terms>.

## **8. How To Opt-Out**

### Emails and Newsletters

If you would like to stop receiving newsletters, promotions, updates and/or special offers at any time, you may email us at **privacy@uscvillage.com** with a statement requesting that you would like to opt out of our email newsletters, promotions, updates and special offers. Please allow sufficient time for your request to be processed. It may take up to 30 days to process an email opt-out request, and 4-6 weeks for other requests.

### Push Notifications

You may at any time opt out from further allowing us to send you push notifications by adjusting the permissions in your mobile device.

### Precise Geolocation

Most browsers and mobile devices allow users to enable or disable precise geolocation using pop-ups or controls located in the settings menu. If you have permitted us to access your precise geolocation data, you may at any time opt out from further allowing us to access your precise geolocation data by adjusting the permissions in your browser or device.

### Uninstall Our Mobile Applications

You can stop all further collection of information by any of our mobile applications by uninstalling the mobile application. You may use the standard uninstall process available as part of your mobile device or via the mobile application marketplace or network.

Note: If you uninstall the mobile application from your device, the unique identifier associated with your device will continue to be stored. If you re-install the application on the same device, we will be able to re-associate this identifier to your previous transactions and activities.

Please be aware that, even if you opt out of receiving marketing communications from us, we may still contact you for transactional purposes. For example, we may contact you for order fulfillment or customer service purposes.

## **9. How to Update Your Information**

You can access or update your personal information in the following ways:

- If you have created an account on our Sites, you may enter and update your contact information after logging in to your account on our Sites.
- You may also contact us by using the "Contact Us" link at the bottom of the page or emailing us at **privacy@uscvillage.com**. Please include your current contact information, the information you are interested in accessing, and your requested changes.

## **10. Your Privacy Rights Under California Law**

If you are a California resident, you have the right to:

- Make a verifiable request that we disclose ("Request to Know") what personal information of yours we have collected, used, disclosed, and/or sold in the 12-month period prior to the date of your request.

- Make a verifiable request that we delete (“Request to Delete”) personal information that we have collected or maintained.
- Designate an authorized agent (“Request to Designate”) to make a request under the California Consumer Privacy Act on your behalf.
- Not receive discriminatory treatment for the exercise of your privacy rights under the California Consumer Privacy Act.

#### How to Make a Request to Know or a Request to Delete

To make a Request to Know or a Request to Delete, you may contact us by (a) telephone at **1.800.977.6255** (b) using the “Contact Us” link at the bottom of the page, (c) emailing us at **privacy@usevillage.com** with “Request for California Privacy Information” in the subject line and body of your message, or (d) mailing us your request to **USC REAM, 620 West McCarthy Way #5, Los Angeles, California 90089**.

So that we may verify your identity, you must submit your request using the email address that you have provided to us, or while logged onto your account if you communicate with us through a password-protected account.

Within 10 days of receiving your request, you may receive an email or text message asking to confirm that you are making the request by responding to the message that we email you to a secondary email or a text message to a mobile number we have on file.

If we receive your request while you are logged into password-protected account, we may send you an email or text to confirm the request.

If you have provided us with a mobile number to send and receive text messages, your mobile provider’s standard rates for sending and receiving text messages still apply.

If we do not have a secondary way to verify your identity, we may ask you to submit a notarized, written request, or to submit your request in person with a valid driver’s license or identification card.

Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request. If we cannot verify your identity to confirm your request, we may not be able to process your Request to Know or Request to Delete.

We may decline 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.*)
- 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.

Within 45 days after we receive your request, we will provide you with the requested information, confirm deletion by email, or provide you with a denial and the reasons for denial.

#### How to Make a Request to Designate

To make a Request to Designate, you may contact us by (a) telephone at **1.800.977.6255** (b) using the “Contact Us” link at the bottom of the page, (c) emailing us at **privacy@uscvillage.com** with “Request for California Privacy Information” in the subject line and body of your message, or (d) mailing us your request to **USC REAM, 620 West McCarthy Way #5, Los Angeles, California 90089**.

You must also include with your Request to Designate the following:

- Your authorized agent’s name
- Your authorized agent’s email
- Your authorized agent’s secondary email or mobile number

If you wish to withdraw the authorized agent designation at any time, you must notify us. If we do not receive such notification, your designated agent may be able to continue to submit a Request to Know or Request to Delete on your behalf. All Requests to Designate shall automatically be deemed expired after 24 months from the date we receive a Request to Designate, and if you wish to maintain or renew a designation, you must submit a Request to Designate, you should submit a new request before the 24 month period.

#### Recordkeeping Practices for Requests to Know, Delete, or Designate

We keep records of all Requests to Know, Delete, or Designate for 24 months from the date that a request is first made. Even if we delete information in response to a Request to Delete, we may keep a record of all of the information deleted for archival purposes.

#### **11. Your Privacy Rights Under Nevada Law**

If you are a Nevada resident, you have the right to submit a request directing us not to make any sale of your personal information. We does not sell your personal information. However, to request email confirmation that we do not sell your personal information, please send an email to **privacy@uscvillage.com** with “Request for Nevada Privacy Information” in the subject line and in the body of your message. We will provide the requested information to you via an email response.

#### **12. How To Contact us**

If you have questions about this Privacy Policy, you may contact us:

- By clicking the “Contact Us” button at the bottom of the page
- By email at: **privacy@uscvillage.com**
- By mail at: **USC REAM, 620 West McCarthy Way #5, Los Angeles, California 90089**

## SUPPLEMENTAL PRIVACY POLICY

**This Supplemental Privacy Policy was last revised on: 11.11.19**

When you sign up as a member of The Village Insider Loyalty Club (the “Loyalty Club”), you will gain access to coupons, special offers, discounts, and other retail incentives that participating retailers at the USC Village may offer from time to time to Loyalty Club members.

We strive to protect your privacy when you register as a Loyalty Club member. This Supplemental Privacy Policy explains how we may collect, use, protect, and disclose your personal information in connection with the Loyalty Club. By participating in, visiting, accessing, or using the Loyalty Club and Loyalty Club Sites, you consent to the terms and practices described in this Supplemental Privacy Policy.

We may change this Supplemental Privacy Policy from time to time. Please check back periodically for up-to-date information about our privacy practices.

### **1. The USC Village Privacy Policy**

The Privacy Policy for USC Village that can be found at <https://uscvillage.com/privacy-policy/> (the “Privacy Policy”) applies to this Supplemental Privacy Policy, except to the extent that it is explicitly modified by this Supplemental Privacy Policy. In addition to the supplemental information contained in this Supplemental Privacy Policy, please review our Privacy Policy to learn more about our privacy practices, including:

- types of information we collect and how we collect them
- how we use, disclose, or share information
- how we protect your information
- how to update your information
- how to request what personal information of yours we have collected, used, disclosed, and/or sold
- how to request that we delete your personal information

### **2. Definitions**

In addition to the terms that are defined in the definitions section of the Privacy Policy, which apply to this Supplemental Privacy Policy and the terms defined elsewhere in this Supplemental Privacy Policy, the following terms used in this Supplemental Privacy Policy mean and refer to the following:

<u>Terms</u>	<u>Definitions</u>
“Loyalty Club Website”:	The website that has its top level domain (TLD) web address or uniform resource locator (URL) at <b><a href="https://member.bstcm.no/usc-village">https://member.bstcm.no/usc-village</a></b> and all subdomains and sub-directories under that top level domain (including any blog pages and subpages).
“Loyalty Club Site” or “Loyalty Club Sites”:	(i) The Loyalty Club Website; (ii) any apps that we develop or operate to allow direct access to the Loyalty Club Website without a web or internet browser, or to allow access to the same services we directly provide on the Loyalty Club Website; (iii) any emails, text messages, online chats, or electronic communication that we use to advertise, promote, or communicate about the Loyalty Club or the Loyalty Club Website, any of the apps described in (ii), or any services we provide through either;

- (iv) any digital ads we develop or use to directly advertise, promote, or communicate about the Loyalty Club or the Loyalty Club Website, any of the apps described in (ii), or any services we provide through either;
- (v) any social media accounts that we own or operate on third-party platforms to directly advertise, promote, or communicate about the Loyalty Club or the Loyalty Club Website, any of the apps described in (ii), or any services we provide through either; and
- (vi) any digital ads (e.g., banner ads) that we develop or operate to directly advertise, promote, or communicate about the Loyalty Club or the Loyalty Club Website, any of the apps described in (ii), or any services we provide through either.

### **3. Supplemental Information About How We Use, Disclose, Or Share Information**

Some functions on Loyalty Club Sites (including the Loyalty Club mobile app) are provided through our partner PlaceWise Digital. PlaceWise Digital is responsible for the technical solutions for data processing. PlaceWise Digital uses sub-contractors for storing some of the data that are transmitted via some of the Loyalty Club Sites (including the Loyalty Club mobile app), and to send SMS and emails relating to the Loyalty Club program and Loyalty Club Sites.

Some personal information you share with us (as described in our Privacy Policy) may be shared with PlaceWise Digital for the purpose of improving our services and the Loyalty Club Sites, to communicate offers that we believe will interest you via the Loyalty Club mobile app, email, SMS, and other Loyalty Club Sites, and to administer our business. If you have provided us or PlaceWise Digital with a mobile number to send and receive text messages, your mobile provider's standard rates for sending and receiving text messages still apply.

PlaceWise Digital may use sub-contractors for storing data and technical solutions for sending SMS and emails. While we require PlaceWise Digital to maintain your privacy to the same extent that we do under our Privacy Policy, we encourage you to review PlaceWise Digital's privacy policies and practices available at: [placewise.com](http://placewise.com)

**We do not sell your PII to PlaceWise Digital or to any other third parties.**

### **4. Links to Third-Party Sites and Third-Party Content on Our Sites**

To enhance your use of Loyalty Club Sites and to provide other sources of information for user convenience, some pages or areas within our Loyalty Club Sites are linked to third-party websites and apps that we do not manage or control. We do not review, control or take responsibility for the content of those sites, and our Privacy Policy and this Supplemental Privacy Policy do not cover the practices of those websites and apps. In addition, we provide links to third-party sites for convenience only and do not imply endorsement or credibility of service, information or products. We encourage you to review their privacy policies and their terms and conditions before visiting any third-party site and to see how they collect and use information.

We also allow third-party retailers and service providers to supply us with information, photographs, videos, and other content to post on the Loyalty Club Sites, or allow them to directly post such information and content on Loyalty Club Sites, to advertise, promote, market or communicate with you about their businesses, products, services, or programs. We do not review, control or take responsibility for such content even if they are posted directly on Loyalty Club Sites. In addition, all such third-party content posted directly on Loyalty Club Sites are provided for convenience only and do not imply endorsement or credibility of service, information or products.

## **5. How to Update Your Information**

You can access or update your personal information in the following ways:

- If you have created an account on the Loyalty Club mobile app or on any other Loyalty Club Sites, you may enter and update your contact information after logging into your account.
- Any of the additional ways described in our Privacy Policy.

## **6. How To Contact Us**

If you have questions about this Supplemental Privacy Policy, you may contact us:

- By clicking the “Contact Us” button at the bottom of the page
- By email at: [privacy@uscvillage.com](mailto:privacy@uscvillage.com)
- By mail at: USC REAM, 620 West McCarthy Way #5, Los Angeles, California 90089

If you have questions about PlaceWise Digital’s privacy practices or their privacy policy, you may contact their Data Protection by email at [webmaster@placewise.com](mailto:webmaster@placewise.com)