

PRIVACY NOTICE

Last updated January 1, 2024

This privacy notice for Debbie Reynolds Consulting LLC ("**Company**," "**we**," "**us**," or "**our**") describes how and why we might collect, store, use, and/or share ("**process**") your information when you use our services ("**Services**"), such as when you:

- Visit our website at <https://www.debbiereynoldsconsulting.com> or any website of ours that links to this privacy notice
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have questions or concerns, please contact us at dpo@debbiereynoldsconsulting.com.

SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with Debbie Reynolds Consulting LLC and the Services, your choices, and the products and features you use.

Do we process any sensitive personal information? We do not process sensitive personal information.

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

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you for security and fraud prevention, and comply with the law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason.

In what situations and with which types of parties do we share personal information? We may share information in specific situations and with specific categories of third parties.

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

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do you exercise your rights? The easiest way to exercise your rights is by contacting us. We will consider and act upon any request following applicable data protection laws.

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1. WHAT INFORMATION DO WE COLLECT?

The personal information you disclose to us

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

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

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

- names
- email addresses

Sensitive Information. We do not process sensitive information.

Payment Data. We may collect data necessary to process your payment if you make purchases, such as your payment instrument number and the security code associated with your payment instrument. Paypal stores all payment data. You may find their privacy notice link(s) here: <https://www.paypal.com/us/legalhub/privacy-full>.

All personal information you provide must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short: Some information – such as your Internet Protocol (IP) address and/or browser and device characteristics – is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser, and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services, which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages, and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).
- *Device Data.* We collect device data such as information about your computer, phone, tablet, or other devices you use to access the Services. Depending on the

device used, this data may include your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

- *Location Data.* We collect location data, such as information about your device's location, which can be precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt-out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you opt-out, you may not be able to use certain aspects of the Services.

2. HOW DO WE PROCESS YOUR INFORMATION?

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

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

- **To deliver and facilitate the delivery of services to the user.** We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To fulfill and manage your orders.** We may process your information to fulfill and manage your orders, payments, returns, and exchanges through the Services.

- **To enable user-to-user communications.** We may process your information if you use any of our offerings to communicate with another user.
- **To request feedback.** We may process your information when necessary to request feedback and contact you about using our Services.
- **To send you marketing and promotional communications.** We may process the personal information you send us for our marketing purposes if this is following your marketing preferences. You can opt-out of our marketing emails at any time. For more information, see "[WHAT ARE YOUR PRIVACY RIGHTS?](#)" below).
- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are used so we can improve them.
- **To determine the effectiveness of our marketing and promotional campaigns.** We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest and prevent harm.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

***In Short:** We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.*

This section applies to you if you are in the EU or UK.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have permitted us (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request before entering into a contract with you.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests, and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described:
 - Send users information about special offers and discounts on our products and services
 - Analyze how our Services are used so we can improve them to engage and retain users
 - Support our marketing activities
 - Diagnose problems and/or prevent fraudulent activities
 - Understand how our users use our products and services so we can improve user experience
- **Legal Obligations.** We may process your information where we believe it is necessary to comply with our legal obligations, such as cooperating with a law enforcement body or regulatory agency, exercising or defending our legal rights, or disclosing your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where it is necessary to protect your vital interests or the vital interests of a third party, such as in situations involving potential threats to the safety of any person.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose or in situations where your

permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations, fraud detection, and prevention
- For business transactions, provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be the victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or an infringement of the laws of Canada or a province
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession, and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations

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

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

Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents ("**third parties**") who perform services for us or on our behalf and require access to such information to do that work. We have contracts with our third parties designed to help safeguard your personal information. This means they cannot do anything with your personal information unless we have instructed them to do so. They will also not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct. The categories of third parties we may share personal information with are as follows:

- Cloud Computing Services
- Data Analytics Services
- Data Storage Service Providers
- Order Fulfillment Service Providers
- Product Engineering & Design Tools
- Performance Monitoring Tools
- Testing Tools
- User Account Registration & Authentication Services
- Website Hosting Service Providers
- Communication & Collaboration Tools
- Finance & Accounting Tools
- Payment Processors
- Social Networks
- Government Entities

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

- **Business Transfers.** We may share or transfer your information in connection with or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or are under common control.
- **Business Partners.** We may share your information with our business partners to offer certain products, services, or promotions.

5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.

6. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: We may transfer, store, and process your information in countries other than your own.

Our servers are located in the United States. If you are accessing our Services from outside the United States, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?" above), in the United States, and other countries.

If you are a resident of the European Economic Area (EEA) or the United Kingdom (UK), then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. However, following this privacy notice and applicable law, we will take all necessary measures to protect your personal information.

European Commission's Standard Contractual Clauses:

We have implemented measures to protect your personal information, including using the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies and our third-party providers. These clauses require all recipients to protect all personal information that they process originating from the EEA or UK following European data protection laws and regulations. Our Standard Contractual Clauses can be provided upon request. We have implemented similar appropriate safeguards with our third-party service providers and partners, and further details can be provided upon request.

7. HOW LONG DO WE KEEP YOUR INFORMATION?

***In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

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

8. HOW DO WE KEEP YOUR INFORMATION SAFE?

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

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

9. DO WE COLLECT INFORMATION FROM MINORS?

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

We do not knowingly solicit data from or market to children under 18. By using the Services, you represent that you are at least 18 or the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under 18, please contact us at dpo@debbiereynoldsconsulting.com.

10. WHAT ARE YOUR PRIVACY RIGHTS?

***In Short:** In some regions, such as the European Economic Area (EEA), United Kingdom (UK), and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

You have certain rights under applicable data protection laws in some regions (like the EEA, UK, and Canada). These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure, (iii) to restrict the

processing of your personal information, and (iv), if applicable, to data portability. In certain circumstances, you may also have the right to object to processing your personal information. You can make such a request by contacting us using the contact details provided in the "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" section below.

We will consider and act upon any request following applicable data protection laws.

If you are located in the EEA or UK and believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

https://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are located in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

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

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

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below. You will then be removed from the marketing lists. However, we may still communicate with you – for example, to send you

service-related messages necessary for your account's administration and use, respond to service requests, or for other non-marketing purposes.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. You can usually set your browser to remove and reject cookies. If you choose to remove or reject cookies, this could affect certain features or services of our Services. To opt-out of interest-based advertising by advertisers on our Services, visit <http://www.aboutads.info/choices/>.

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

11. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers, mobile operating systems, and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference and not to have data about your online browsing activities monitored and collected. Our business is not required to respond to DNT browser signals. If this is required for online tracking that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

12. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

***In Short:** Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.*

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you

are a California resident and would like to make such a request, please submit your request in writing using the contact information provided below.

If you are under 18, reside in California, and have a registered account with Services, you have the right to request the removal of unwanted data that you publicly post on the Services. To request the removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will ensure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g., backups, etc.).

CCPA Privacy Notice

The California Code of Regulations defines a "resident" as:

- (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

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, we must adhere to certain rights and obligations regarding your personal information.

What categories of personal information do we collect?

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
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A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES
B. Personal information categories listed in the California Customer Records statute	Name, contact information, education, employment, employment history, and financial information	YES
C. Protected classification characteristics under California or federal law	Gender and date of birth	NO
D. Commercial information	Transaction information, purchase history, financial details, and payment information	NO
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements	NO
G. Geolocation data	Device location	YES

H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video, or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details to provide you with our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	NO
J. Education Information	Student records and directory information	NO
K. Inferences are drawn from other personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	NO

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

How do we use and share your personal information?

Debbie Reynolds Consulting LLC collects and shares your personal information through:

- Targeting cookies/Marketing cookies
- Beacons/Pixels/Tags

More information about our data collection and sharing practices can be found in this privacy notice.

You may contact us by email at dpo@debbiereynoldsconsulting.com or by referring to the contact details at the bottom of this document.

If you are using an authorized agent to exercise your right to opt-out, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Will your information be shared with anyone else?

We may disclose your personal information with our service providers according to a written contract between each service provider and us. Each service provider is a for-profit entity that processes the information on our behalf.

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

Debbie Reynolds Consulting LLC has not sold any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. Debbie Reynolds Consulting LLC has disclosed the following categories of personal information to third parties for a business or commercial purpose in the preceding twelve (12) months: The categories of third parties to whom we disclosed personal information for a business or commercial purpose can be found under "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?".

Your rights concerning your personal data

Right to request deletion of the data – Request to delete

You can ask to delete your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to

certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.

Right to be informed – Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;
- whether we sell your personal information to third parties;
- the categories of personal information that we sold or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold or disclosed for a business purpose, and
- the business or commercial purpose for collecting or selling personal information.

Under applicable law, we are not obligated to provide or delete consumer information de-identified in response to a consumer request or re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person with whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with the information you have previously provided us. For instance, depending on the type of request you submit,

we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use the personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for verification. However, if we cannot verify your identity from the information we maintained, we may request that you provide additional information to verify your identity and for security or fraud-prevention purposes. We will delete such additional information as soon as we finish verifying you.

Other privacy rights

- You may object to processing your personal information.
- You may request correction of your personal data if it is incorrect or no longer relevant or ask to restrict the processing of the information.
- You can designate an authorized agent to request the CCPA on your behalf. We may deny a request from an authorized agent who does not submit proof that they have been validly authorized to act on your behalf following the CCPA.
- You may request to opt-out from future selling of your personal information to third parties. Upon receiving an opt-out request, we will act upon the request as soon as feasibly possible, but no later than fifteen (15) days from the request submission date.

To exercise these rights, you can contact us by email at dpo@debbiereynoldsconsulting.com or by referring to the contact details at the bottom of this document. If you have a complaint about how we handle your data, we would like to hear from you.

13. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice to comply with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date, and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

14. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, contact our Data Protection Officer (DPO), Debbie Reynolds, by email at dpo@debbiereynoldsconsulting.com.

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

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, contact our Data Protection Officer (DPO), Debbie Reynolds, by email at dpo@debbiereynoldsconsulting.com.