

California Consumer Privacy Act

Effective Date: 4/4/22

This notice ("CCPA Notice") applies to California residents that are "Consumers" as defined in the California Consumer Privacy Act ("CCPA") and is a supplement to Eyecare Services Partner's other privacy policies or notices, including our Privacy Policy. In the event of a conflict between this CCPA Notice and the Privacy Policy, or other Eyecare Services Partner's privacy policies, this CCPA Notice shall govern as to our rights or obligations under the CCPA. Capitalized terms that are used herein shall have the meaning given to them in the Privacy Policy unless otherwise noted.

This CCPA Notice provides you with notice of the "Personal Information" ("PI") (as defined in the CCPA) we collect and our purposes for that collection for data that may be subject to the CCPA. This CCPA Notice does not cover information that is outside of the scope of the CCPA, including data we collect and process as necessary to operate our insurance businesses, which is regulated by the Health Insurance Portability and Accountability Act of 1996 and the Gramm-Leach-Bliley Act of 1999. This notice also does not apply to data collected from employees, applicants or contractors or to data collected from individuals acting as representatives of another business in connection with business communications or transactions.

We collect PI directly from you, your device or browser, our service providers and suppliers, and our corporate affiliates. We use and share PI for the following business purposes:

- To provide requested products and services;
- To advertise and offer new products and services;
- To improve our products and services;
- For quality assurance;
- For research development;
- For prevention of fraud and illegal activity; and
- For marketing purposes.

We may also collect, use and share PI for our operational purposes as set forth in our Privacy Policy. We collect the following categories of PI from Consumers which we share only with our service providers for our business and operational purposes:

- Identifiers (e.g., name, phone number, email address, IP address, social security number, driver's license number, credit card number);

- Personal records (e.g., name, phone number, email address);
- Consumer characteristics (e.g., age, gender, family status);
- Customer account details;
- Internet usage information (e.g., information regarding your interaction with our online services);
- Geolocation data;
- Professional or employment information (e.g., profession, employment history); and
- Commercial information (e.g. personal property, purchasing or consuming history).

We collect the following categories of PI from Consumers which we do not share with any third parties:

- Inferences from Personal Information collected (e.g., your preferences, your likelihood of interest in certain of our services).

If you are a California Consumer and would like to register a request pursuant to your CCPA “right to know about personal information collected, disclosed or sold” (including right to obtain copies of specific pieces and/or information about categories of PI practices), “right to request deletion of personal information,” or “right to opt-out of sale of personal information,” you can write to us at Compliancenotify@espmgmt.com, or Eyecare Services Partners, 2727 North Harwood Street, Suite 350, Dallas, Texas 75201, 844.377.6468 You have the right to not receive discriminatory treatment in a manner prohibited by the CCPA as a result of your exercising your rights under the CCPA.

To fulfill your CCPA request, we may require you to provide sufficient information to reasonably verify you are the Consumer about whom we collected PI. This verification process includes providing us at least two (2) unique data points, depending on the type of request.

Consumers have the right to exercise CCPA privacy rights via an authorized agent who meets the agency requirements of the CCPA. Authorized agent requests must include a copy of the agency agreement between the authorized agent and the consumer. We will ask the consumer to independently confirm the agency relationship.

The Right to Know

- Categories: You have the right, subject to statutory exceptions, to send us a request, no more than twice in a 12-month period, for any of the following for the period that is 12 months prior to the request date:
- The categories of PI we have collected about you.
- The categories of sources from which we collected your PI.

- The business or commercial purposes for our collecting or selling your PI.
- The categories of third parties to whom we have shared your PI.
- A list of the categories of PI disclosed for a business purpose in the prior 12 months, or that no disclosure occurred.
- Specific Pieces: You have the right, subject to statutory exceptions, to make or obtain a transportable copy, no more than twice in a twelve-month period, of your PI that we have collected in the period that is 12 months prior to the request date and are maintaining.

The Right to Request Deletion

You have the right, subject to statutory exceptions, to request that we delete your PI that we have collected directly from you and are maintaining. Note also that we are not required to delete your PI that we did not collect directly from you. You may alternatively exercise more limited control of your PI by instead by canceling or modifying our email marketing communications you receive from us. You can do so by following the instructions contained within our promotional emails.

The Right to Opt Out of Sale of Personal Information

The CCPA gives you the right to opt out of the sale of your personal information. However, we do not “sell” PI that we collect from you, including PI of minors under the age of 16, in accordance with the definition of “sell” in the CCPA. We treat all PI that we collect from you as subject to a “do not sell” request.

We work with service providers and partner with advertising companies that use cookies and other tracking technologies to collect information about your visits to our website and third-party sites, and then use that information to deliver advertisements relevant to your interests. There is not yet a consensus as to whether third party cookies and tracking technologies associated with our websites and mobile apps constitute a “sale” of your PI as defined by the CCPA. You may opt out of interest-based advertising using ad industry opt out tools by visiting youradchoices.com/control or optout.networkadvertising.org. To effectively manage cookies via this cookie settings tool, you must set cookie preferences on all browsers and all devices that you use. If you clear the cookies on your device, you may need to set your cookie preferences again. We are not responsible for the completeness, accuracy or effectiveness of any third-party programs, tools or frameworks, or the information they provide.