#### **UNIDAYS - US State Privacy Notice**

Last Updated: July 2023

#### **Notice For Citizens of the United States**

Your privacy is our priority. We appreciate that you entrust us with your personal information and want you to know that we respect your privacy. Therefore, UNiDAYS has taken one approach to respecting and protecting US citizens' privacy rights. In other words, we combined the highest degree of privacy rights granted by various US state laws so that the highest degree of privacy rights can be exercised by a US citizen. For completeness, we have also added details of some state laws for awareness.

## What rights can I exercise?

- Right to Know/Access: You have a right to request that we disclose, up to two times per year: (1) the categories of personal information we have collected, sold, or shared about you; (2) the categories of sources from which your personal information was collected, sold, or shared; (3) the business or commercial purpose for collecting, selling, or sharing your personal information; (4) the categories of third parties to whom we've sold, shared, or disclosed for a business purpose your personal information; and (5) the specific pieces of personal information we have collected about you. You have a right to access your personal information subject to certain exceptions, and obtain a copy of the personal information in a portable format.
- Right to Delete. You have a right to request that we delete the personal information we hold about you, subject to certain exceptions available under applicable law.
- <u>Right to Correct</u>. You have a right to ask that we correct inaccurate or incorrect personal
  information we have collected about you, subject to certain exceptions available under
  applicable law. Also you can login to your account and make any correction to your personal
  information, as may be necessary.
- Right to Opt-Out. You have a right to opt-out of the sale or sharing of your personal information or the use of your personal information for targeted advertising.
- Right to Non-Discrimination. You have a right to exercise the above rights without being discriminated against.

## How do I exercise my rights?

If you are using the **UNIDAYS website**, you can exercise your rights at any time as follows:

- To submit a request for Right to Delete, please fill out the Right To Be Forgotten <u>form</u>. Alternatively you can contact us at <u>dpo@myunidays.com</u>;
- To submit a request for Right to Know/Access, please fill out the Right To Know/Access <u>form</u>. Alternatively you can contact us at <u>dpo@myunidays.com</u>;

- To submit a request for Right to Correct, please contact us at <a href="mailto:dpo@myunidays.com">dpo@myunidays.com</a>. You also can login to your account at any time and make any correction to your personal information, as may be necessary. Alternatively you can contact us at <a href="mailto:dpo@myunidays.com">dpo@myunidays.com</a>.
- To submit a request to opt-out of the sale of your personal information, please click the 'Do Not Sell or Share My Personal Information' button on the footer of this website. Alternatively, you can contact us at dpo@myunidays.com.
- To submit a request to opt-out of the sharing of your personal information, please click the 'Do
  Not Sell or Share My Personal Information' button on the footer of this website. Alternatively,
  you can contact us at <a href="mailto:dpo@myunidays.com">dpo@myunidays.com</a>.
- To submit a request to opt-out of the use of your personal information for targeted advertising, please click the 'Do Not Sell or Share My Personal Information' button on the footer of this website. Alternatively, you can contact us at <a href="mailto:dpo@myunidays.com">dpo@myunidays.com</a>

If you are using the UNIDAYS App, you can exercise the above rights at any time by selecting the 'Account' tab in the App and then selecting the 'Do Not Sell or Share My Personal Information' option. Alternatively you can contact us at <a href="mailto:dpo@myunidays.com">dpo@myunidays.com</a>

## Notice For California Residents - California Consumer Privacy Act

#### **Definitions**

- <u>Personal information</u>. Information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you or your household.
- <u>Sensitive personal information</u>. Social security number, driver's license number, state identification card, passport number, account log-in and password, financial account and password, debit or credit card number and access code, precise geolocation information, race, ethnic origin, religious or philosophical beliefs, union membership, the content of your mail, email or texts other than those communications with us, genetic data, biometric information, health information, and information that concerns your sex life or sexual orientation.
- <u>Sell, sale, or sold</u>. Selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or other means, your personal information to a third party for money or other valuable consideration.
- <u>Share, shared, or sharing</u>. Shearing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or other means, your personal information to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.

#### **Your Rights**

You may designate an authorized agent to submit a request for any of the rights below on your behalf. When you use an authorized agent, you must provide the authorized agent with a signed written

permission to do so. We may also ask you to verify your own identity directly with us. The process for exercising the below rights is set out above under the heading 'How do I exercise my rights' here.

- Right to Know: You have a right to request that we disclose, up to two times per year: (1) the categories of personal information we have collected, sold, or shared about you; (2) the categories of sources from which your personal information was collected, sold, or shared; (3) the business or commercial purpose for collecting, selling, or sharing your personal information; (4) the categories of third parties to whom we've sold, shared, or disclosed for a business purpose your personal information; and (5) the specific pieces of personal information we have collected about you.
- Right to Delete. You have a right to request that we delete the personal information we hold about you, subject to certain exceptions available under applicable law.
- <u>Right to Correct</u>. You have a right to ask that we correct inaccurate or incorrect personal
  information we have collected about you, subject to certain exceptions available under
  applicable law. Also you can login to your account and make any correction to your personal
  information, as may be necessary.
- Right to Opt-Out of the Sale or Sharing of Your Personal Information. You have a right to opt-out of the sale or sharing of your personal information.
- Right to Non-Discrimination. You have a right to exercise the above rights without being discriminated against.

### **Notice of Collection**

Below we identify the categories of personal information we have collected about California residents in the 12 months preceding the date this US State Privacy Notice was last updated. This list includes information about: (1) whether this information includes sensitive personal information; (2) the categories of sources from which the personal information was collected; (3) the business or commercial purpose for collecting, selling, or sharing the personal information; and (4) the categories of third parties with whom we disclose such information.

- <u>Identifiers</u>: Information such as your name, telephone number, unique personal identifier, online identifier, IP address, country of residence, student ID card, university/college academic institution, enrollment status, university/college/academic institution supporting documents, social media username, email address.
- <u>Sensitive Personal Information</u>: information used to secure your account (account login email address and password).
- Characteristics of protected classifications under California law: gender and age.
- <u>Audio and Visual Information:</u> pictures you may upload to our website, applications, and platforms.
- Internet or other Electronic Network Activity Information: Includes information about your interaction with our websites and applications, advertisements, and browsing history on our platform.
- **Commercial Information**, such as records of the products and services you consider, interact with and redeem through our website and app.
- **Geolocation Information**, such as your country or city-level location or time zone.

• <u>Inferences</u>, derived from the above information, excluding Sensitive Personal Information, to create a profile reflecting an individual's preferences and characteristics.

Disclosure	Categories	Description			
	Identifiers	We collect this category of information from you directly.			
How do we collect this information?	Sensitive Personal Information*	We collect this category of information from you directly when you log in to the website			
information:	Characteristics of protected classifications under California law	or app.  We collect this category of information from you directly.			
	Audio and Visual Information	We collect this category of information from you directly.			
	Internet or other electronic activity information	We collect this category of information from you or your device(s) when you provide it to us or interact with us online (such as through our website or app). We also collect this information from third parties such as our partners, online advertising networks and social networks.			
	Commercial information	We collect this category of information from you directly, including automatically from your device(s). We also collect this information from third parties such as our partners.			
	Geolocation information	We collect this category of information from you or your device(s) when you provide it to us or interact with us online.			
	Inferences	We draw inferences about you from the information we collect from you or your device(s) when you provide it to us or interact with us online. We also draw inferences about you from the information we collect from third parties such as our partners.			
Does this include sensitive personal information?	Yes. * Denotes which categories may include sensitive personal information.				

Is the information "sold" or "shared"?	We share your personal information with third parties (such as advertising, analytics and marketing partners including social platforms) to show ads on social platforms that are personalized to your interests and to measure their effectiveness, this may be considered a "sale" or "sharing" of your personal information, as defined under California law.  We do not disclose, sell, or share personal information to third parties for money or compensation.	
What is our business purpose for collecting your information?	See <a href="https://www.myunidays.com/US/en-US/privacy-policy#what_information">https://www.myunidays.com/US/en-US/privacy-policy#what_information</a> does unidays collect and why	
Who do we disclose this information to?	See	

## **Notice of Disclosure for a Business Purpose**

In the last 12 months preceding the date this Privacy Notice was last updated, we have shared with third parties, for a business or commercial purpose, the types of personal information described in the "Notice of Collection" section above. For a list of the categories of third parties with whom we've disclosed the information, please click <a href="here">here</a>.

#### **Notice of Sale and Sharing**

We share your personal information with third parties (such as advertising, analytics and marketing partners including social platforms) to show ads on social platforms that are personalized to your interests and to measure their effectiveness, this may be considered a "sale" or "sharing" of your personal information, as defined under California law.

We do not disclose, sell, or share personal information to third parties for money or compensation.

To opt-out of the sale or sharing of your personal information, please click the 'Do Not Sell or Share My Personal Information' button on the footer of this website. If you are using the UNiDAYS App, you can exercise these opt-out rights at any time by selecting the 'Account' tab in the App and then selecting the 'Do Not Sell or Share My Personal Information' option. Alternatively you can contact us at <a href="mailto:dpo@myunidays.com">dpo@myunidays.com</a>

We don't sell or share the personal information or sensitive personal information of any California resident who is under the age of 16.

## **Notice of Processing Sensitive Personal Information**

We do not use California residents' sensitive personal information to infer characteristics about California residents.

## **US-wide Metrics on Consumer Rights Requests for 2022**

The following chart shows details about the consumer rights requests we received in the United States from January 1, 2022 to December 31, 2022:

Request Type	Received	Complied with in whole	Complied with in part	Denied	Average Days to Respond
Requests to Know	126	126	NA	0	0 days
Requests to Delete	19,151	19,151	NA	NA	11 Days
Requests to Opt-Out of Sales	1	1	NA	NA	0 days

#### California's "Shine in the Light" law

If you are a California resident and an UNiDAYS customer, you have the right to request information from us once per calendar year regarding the customer information we share with third parties for the third parties' direct marketing purposes. To request this information, please send an email to <a href="mailto:DPO@myunidays.com">DPO@myunidays.com</a> with 'Request for California 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.

#### California's "Eraser Button" law

If you are a California resident under 18 years old and a registered user of the Site (as defined above), you can request that we remove content or information that you have posted to our website or other online services. Fulfillment of the request may not ensure complete or comprehensive removal (e.g., if the content or information has been reposted by another user). To request removal of content or information, please contact us at <a href="mailto:DPO@myunidays.com">DPO@myunidays.com</a>

# Notice For Virginia, Colorado, Utah, and Connecticut Residents Definitions

- <u>Personal information</u>. Information that is linked or reasonably linkable to an identified or identifiable individual.
- <u>Sensitive personal information</u>. Information that includes data revealing racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, sex life, sexual orientation or citizenship or immigration status, the processing of genetic or biometric data for the purpose of

- uniquely identifying an individual, personal data collected from a known child, or precise geolocation data.
- Sell, sale, or sold. The exchange of personal data for monetary or other valuable consideration.
- <u>Targeted advertising</u>. Displaying advertisements to a consumer where the advertisement is selected based on personal data obtained or inferred from that individual's activities over time and across nonaffiliated Internet web sites or online applications to predict such individual's preferences.

#### **Notice of Collection**

To learn more about the categories of personal information we collect about you and how we use it, please click <a href="here">here</a>. To learn more about the categories of third parties with whom we may share your personal information, please click <a href="here">here</a>. The process for exercising the below rights is set out above under the heading 'How do I exercise my rights' <a href="here">here</a>.

#### Your Rights

- Right to Know and Access: You have a right to know whether UNiDAYS is processing your personal information, access such personal information subject to certain exceptions, and obtain a copy of the personal information in a portable format.
- Right to Delete. You have a right to request that we delete your personal information.
- Right to Correct. You have a right to ask that UNIDAYS correct the personal information it has about you, subject to certain exceptions.
- Right to Opt-Out. You have a right to opt-out of the sale or use of your personal information for targeted advertising.
- Right to Non-Discrimination. You have a right not to be discriminated against for the exercise of your rights described herein.

## Notice for Nevada Residents

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. UNiDAYS does not sell your personal information under Nevada law. However, to request email confirmation that we do not sell your personal information, please send an email to <a href="mailto:dpo@myunidays.com">dpo@myunidays.com</a> 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.