

## SUPPLEMENT PRIVACY POLICY FOR CO, VA, UT, CT

Updated: May 24, 2023

This Supplemental Privacy Policy (“Supplemental Policy”) is provided in addition to the Awespira Global Privacy Policy and applies only to information collected about consumers residing in Colorado, Virginia, Utah, or Connecticut (“consumer(s)”, “you”, “your”). This Supplemental Policy describes the practices of AveNew Solutions LLC (“we”, “us”, “our”) regarding the collection, use, and disclosure of your personal information and provides instructions for submitting data subject requests.

### **CHANGES TO THIS SUPPLEMENTAL POLICY**

The Effective Date of this Supplemental Policy is set forth at the top of this webpage. As business needs change, we will review our practices regarding the collection and use of your Personal Information, and we may amend this Supplemental Policy as appropriate. The amended Supplemental Policy supersedes all previous versions. We will alert you about any changes by updating the “Updated” date to this Supplemental Policy, and you waive any right to receive specific notice of each such change. It is your responsibility to periodically review this Supplemental Policy to stay informed of updates. You will be subject to and will be deemed to have been made aware of and to have accepted the changes in any revised Supplemental Policy by your continued use of this website after the date such revised Supplemental Policy is posted. Your continued use of the Services after the posted “Updated” date constitutes your acceptance of the revised or amended Supplemental Policy. If you do not agree with the Supplemental Policy on this website or any revisions to the Supplemental Policy, you agree to immediately stop accessing and using this website.

### **SUPPLEMENTAL POLICY**

This Supplemental Policy provides information required under the Colorado Privacy Act of 2021 (the “CPA”), the Virginia Consumer Data Protection Act of 2021 (the “VCDPA”), the Utah Consumer Privacy Act of 2022 (the “UCPA”), and the Connecticut Data Privacy Act of 2022 (“CDPA”).

#### Definitions Specific to this Supplemental Policy

- “Consumer” means a natural person who resides in Colorado, Virginia, Utah, or Connecticut and to whom we offer information, goods, or services.
- “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or household. Personal Information does not include de-identified data or publicly available information.
- Personal Information also includes “Sensitive Personal Information,” as defined below.
- “Sensitive Personal Information” means Personal Information that reveals a Consumer’s: 1) Social security, driver’s license, state identification card, or passport number; 2) Account log-in, financial account number, debit card number, or credit card number in combination with any required security or access code, password, or

credentials allowing access to the individual's account; 3) Precise geolocation; 4) Racial or ethnic origin; 5) Religious beliefs; 6) Union membership; 7) Contents of email or text messages, unless we are the intended recipient; 8) Genetic data; 9) Biometric information used to uniquely identify the Consumer, and 10) Health, sex life, or sexual orientation.

- "Sell," "Sale," or "Sold" means renting, releasing, or transferring an individual's Personal Information to a Third Party for money or other valuable consideration.
- "Share," "Shared," or "Sharing" means transferring an individual's Personal Information to a Third Party for behavioral advertising purposes, whether or not for money or other valuable consideration.
- "Third Party" means a person or organization which is not a Consumer, Vendor, or an entity owned or controlled by us.
- "Vendor" means a "service provider," "contractor," or "processor" which collects, stores, or otherwise handles data for us.

These definitions apply, whether terms are capitalized or not. Other terms used in this Supplemental Policy may be defined under the CPA, VCDPA, UCPA, or CDPA, and they shall have the meanings described in those statutes. If there are variations between such definitions in different laws, you will be covered by the definition that applies in your state.

The Personal Information we collect about you depends on your interactions and engagement with us.

We may collect the following types of Personal Information:

- A. **Direct Identifiers and Personal Information Provided by You** such as your name, postal address, email address, telephone or mobile number, unique personal identifiers, online identifier, Internet Protocol, email address, account name, your signature, social security number, driver's license or state identification card, employment, employment history, financial information, and any information needed to assist you with a financial matter, debit card, payment card, or payments we receive from you, or make or send on your behalf.
- B. **Protected Characteristics** such as your age (including birthdates), marital status, sex (including gender), gender identity, gender expression, race, ancestry, national origin, citizenship, veteran, or military status.
- C. **Commercial Information** such as records of purchase history of products or services, financial details, payment information, any background information provided by you or collected by us as part of our business analysis, client onboarding, regulatory compliance checks and other related processes, and other client information provided to or made available to us by or on behalf of you, as well as information generated by us in the course of providing our products or services to you.
- D. **Internet or Other Electronic Network Activity Information** such as records of your use of our website, mobile applications, or other online services. This may include your online identifiers, IP address, details of your device, operating system and browser,

browser history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements.

- E. **Social Media Login Data.** We may provide you with the option to register with us using your existing social media account details, such as your Facebook, Twitter, or other social media account. If you choose to register this way, we will collect the information as follows:

#### **SOCIAL MEDIA LOGINS.**

We may offer you the ability to register and login using your third-party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, profile picture as well as other information you choose to make public on such social media platform.

We will use the information we receive only for the purposes that are described in this Supplemental Policy or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy policy to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

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

The app does use third party services that may collect information used to identify you.

- Privacy policy of [Google Play Store](#).
- Privacy policy of [Apple App Store](#).
- Privacy policy of [Facebook](#).
- Privacy policy of [Twitter](#).
- Privacy policy of [Google](#).

- F. **Geolocation Data** such as your location as derived from your IP address, or information collected through your use of our mobile applications, including (i) the location of the mobile device or tablet derived from GPS or WiFi use and (ii) other information made available by a user or others that indicates the current or prior location of the user, such as geotag information in photographs. If you do not want us to collect such data from your device, please delete the App or disable the location setting on your device or tablet. Disabling the location setting may affect your ability to access and use our mobile applications.
- G. **Audio, electronic, visual, or other sensory information**, such as records of building and suite access and parking card use, and footage from building security cameras that indicate your location.
- H. **Sensitive Personal Information** such as government-issued identification information, social security number, visa and passport information, account names and passwords,

and (where necessary to fulfill our legal obligations or to provide you with a requested service).

**I. Inferences drawn from other Personal Information.**

Example: Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's taste, color, or purchasing preferences and characteristics.

We may also collect other personal information outside of these categories in 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.

**Retention of Data**

We intend to retain each category of personal information described above only for as long as necessary to fulfill the purpose for which it was collected, or a related and compatible purpose consistent with the average consumer's expectation, and to comply with applicable laws and regulations. We consider the following criteria when determining how long to retain personal information: why we collected the personal information; the nature of the personal information; the sensitivity of the personal information; our legal obligations related to the personal information, and risks associated with retaining the personal information.

**Your Rights to Your Personal Information**

Colorado, Virginia, Utah, and Connecticut consumers have certain rights with respect to the collection and use of their personal information.

**Right to Receive Information on Privacy Practices.** You have the right to receive the following information at or before the point of collection:

- The categories of personal information to be collected;
- The purposes for which the categories of personal information are collected or used;
- Whether or not that personal information is sold or shared with Third Parties or disclosed to Vendors;
- If the business collects Sensitive Personal Information, the categories of Sensitive Personal Information to be collected, the purposes for which it is collected or used, and whether that information is sold or shared; and
- The length of time the business intends to retain each category of personal information, or if that is not possible, the criteria used to determine that period.

We have provided such information in this Supplemental Policy, and you may request further information about our privacy practices by using the contact information provided in the "Contact Us" Section at the end of this Supplemental Policy.

**Right to Know and Right to Access.** You have the right to submit requests related to the personal information we have collected about you. You may make such a request twice in a 12-

month span. Please note, there are circumstances when we may not be able to comply with your request. For example, we may not be able to verify your request, or we may find that providing a full response conflicts with other legal obligations or regulatory requirements. We will notify you if this is the case.

You have the right to request:

- Specific pieces and categories of personal information we collected about you;
- The categories of sources from which personal information was collected;
- The purposes for which personal information was collected, shared, sold, or processed;
- The categories of personal information we shared, sold or disclosed; and
- The categories of Vendors or Third Parties with whom we shared, sold or disclosed personal information.

If you would like to make a request to know or to access your personal information, you can contact us using the information in the section “Contact Us” at the end of this Supplemental Policy.

**Right to Delete.** You have the right to request that we delete certain personal information that we have collected. If you would like to make a request to delete your personal information, you can contact us using the information in the section “Contact Us” at the end of this Supplemental Policy.

**Right to Correct.** You have a right to request that we correct any inaccurate personal information we may retain about you. If you would like to make a request to correct your personal information, you can contact us using the information in the section “Contact Us” at the end of this Supplemental Policy.

**Right to Opt-Out of the Sale and Sharing of Your Personal Information.** You have the right to opt-out of the sale and sharing of your personal information with Third Parties, and the right to opt out of the processing of personal information for targeted advertising purposes. If you would like to opt-out, you can contact us using the information in the section “Contact Us” at the end of this Supplemental Policy.

**Right to Opt-Out of Sale or Use of Your Personal Data for Targeted Advertisement.** You have the right to opt-out of having your Personal Data, including Sensitive Data, sold and/ or used for targeted advertising. For clarity, AveNew Solutions LLC does not sell Personal Data or Sensitive Data for monetary consideration. If you wish to opt-out of selling of your Personal Data, please contact us using the information in the section “Contact Us” at the end of this Supplemental Policy.

#### **Right to Opt-In**

You have the right to opt-in to the sale or sharing of your personal information after you have opted out. If you would like to opt-in to the sale or sharing of your personal information, you

can contact us using the information in the section “Contact Us” at the end of this Supplemental Policy.

**Right to Consent to or Limit the Use of Your Sensitive Personal Information.** You have the right to consent to the use of your Sensitive Personal information in CO, CT, VA, and UT.

**Right to Data Portability.** You have the right to obtain a copy of your Personal Data that you previously provided to us in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another controller without hindrance, where the processing is carried out by automated means.

**Right to Non-discrimination.** You have a right to exercise the above rights, and we will not discriminate against you for exercising these rights. Please note that a legitimate denial of a request to access, delete, or opt-out is not discriminatory, nor is charging a fee for excessive or repetitive requests.

**Right to Appeal.** If we are unable to provide you with the requested information, you can appeal our decision by contacting us at [Awespira@AveNew.org](mailto:Awespira@AveNew.org), and within sixty (60) days of receipt of your appeal, we will inform you in writing of any action taken or not taken in response to your appeal, including a written explanation of the reasons for the decisions.

**Verification:** Only you or your authorized agent may submit a consumer request. You may submit a consumer request on behalf of your minor child. In order to respond to your consumer request, we will take steps to verify your identity before processing your request. To the extent possible, we will use our existing account authentication practices to verify your identity. Where necessary, we may request additional information about you so that we can verify your identity. Where we did not already hold that information, we will use it only for the purpose of verifying your identity and to process your request. If we cannot verify your identity based on the information provided, we will let you know that we are unable to fulfil your request.

Please note that if we maintain your Personal Information on behalf of a third party, we may need to refer you to that third party in order to respond to your request. If we cannot comply with your request, or with part of your request, we will explain the reasons in our response.

**Authorized Agent:** You may use an authorized agent to submit a privacy rights request. Authorized agents may exercise rights on behalf of you by submitting a request via phone at 1-213-387-0780 or email at [Awespira@AveNew.org](mailto:Awespira@AveNew.org) and indicating that they are submitting the request as an agent. When we verify your agent’s request, we may verify both you and your agent’s identity and request a signed declaration from you that authorizes your agent to make the request on your behalf. To protect your Personal Information, we reserve the right to deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf.

## **COOKIES AND OTHER DATA COLLECTION TECHNOLOGY**

A “**Cookie**” is a small text file that is sent to or accessed from your web browser or your computer’s hard drive. A Cookie typically contains the name of the domain (internet location) from which the Cookie originated, the “lifetime” of the Cookie (when it expires), and a randomly generated unique number, or other similar identifier. A Cookie may also contain information about your computer, such as user settings, browsing history and activities conducted while using our online Services.

A “**Web Beacon**” (also called a “pixel tag” or “clear GIF”) is a piece of computer code that enables us to monitor user activity and website traffic.

We refer to Cookies, web beacons (also known as pixel tags and clear GIFs) and other similar technology as “**Data Collection Technology.**” To learn more about cookies and web beacons, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

Data Collection Technology helps us improve your experience on our online Services. For example, we use Google Analytics, a web-based analytics tool that tracks and reports on the manner in which the website is used to help us to improve it. Google Analytics does this by placing Cookies on your device. The information that the Cookies collect, such as the number of visitors to the website, the pages visited and the length of time spent on the website, is aggregated. We also may use Data Collection Technology to collect information from the computer or device that you use to access our online Services, such as your operating system type, browser type, domain and other system settings, as well as the language your system uses and the country and time zone in which your computer or device is located.

### **YOUR CONTROL OF COOKIES**

Some web browsers (including some mobile web browsers) provide settings that allow you to control or reject Cookies or alert you when a Cookies is placed on your device. You may also be able to reject mobile device identifiers by activating the appropriate setting on your mobile device. Although you are not required to accept Cookies or mobile device identifiers, if you block or reject them, you may not have access to all features available through our online Services.

Although you are not required to accept cookies, web trackers or mobile device identifiers, if you block or reject them, you may not have access to all features available through the Services. If you change computers, devices, or browsers; use multiple computers, devices, or browsers; or delete your cookies, you may need to repeat this process for each computer, device, or browser. Your ability to limit browser-based tracking technologies is subject to your browser settings and limitations.

- You may disable the use of advertising cookies and other tracking technologies. Please click here for [Cookie and Privacy Settings](#). You must complete this step on each of our websites from each browser and on each device that you use. These steps are necessary so that we can place a first-party cookie signaling that you have opted out on each browser and each device you use. Please note:

- If you block cookies, we will be unable to comply with your request to opt out with respect to device data that we automatically collect and disclose to third parties online using cookies, pixels, and other tracking technologies.
- If you clear cookies, you will need to disable the use of all advertising cookies and tracking technologies in the preference center again on each browser on each device where you have cleared cookies.

Regular cookies generally may be disabled or removed using tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. The choices available, and the mechanism used, will vary from browser to browser. Some web browsers (including some mobile web browsers) provide settings that allow you to control or reject cookies or alert you when a cookie is placed on your computer or device.

You may also be able to reject mobile device identifiers by adjusting the appropriate setting on your mobile device. Such browser settings are typically found in the “options,” “tools” or “preferences” menu of your browser. You may also consult your browser’s “help” menu.

### **CHILDREN’S PRIVACY**

Our online content and services are not directed to or intended for use by minors. Consistent with the requirements of the US Children’s Online Privacy Protection Act, and all other applicable laws and regulations. If we learn that we have received information directly from a child under age 16 without his or her parent or legal guardian’s verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use our services. Subsequently, we will delete such information.

### **OUR SERVICES NOT INTENDED FOR MINORS UNDER 18 YEARS OF AGE**

Our Services are not directed to, nor are they intended for minors under 18 years of age. We do not knowingly solicit data from or market to minors under 18 years of age. By using the Services, you represent that you are at least 18. If we learn that personal information from a minor 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 minors under age 18, please contact us at [Awespira@AveNew.org](mailto:Awespira@AveNew.org).

### **CONTACT US**

We welcome your questions and comments about this Supplemental Policy. You may contact us by email at [Awespira@AveNew.org](mailto:Awespira@AveNew.org), by phone at 213-387-0780, or by mail to:

AveNew Technologies, Inc.  
5256 S. Mission Rd. Ste 703, #335  
Bonsall, CA 92003