

## VIRGINIA CONSUMER DATA PROTECTION ACT

This section provides information for Virginia consumers in connection with the Virginia Consumer Data Protection Act (“VCDPA”). Under the VCDPA, and for purposes of this Section, “Personal Data” generally means information that identifies, relates to, or describes a particular Virginia consumer and includes the categories listed below. This Section 9 provides details about the categories of Personal Data of Virginia consumers that we have collected, disclosed, processed for purposes of targeted advertising, as well as rights Virginia consumers have under Virginia law.

### **Categories of Personal Data Collected or Disclosed, or Processed for Targeted Advertising:**

The categories of Personal Data that we collected or disclosed, or processed for purposes of targeted advertising are below, along with the categories of third parties to whom each category of Personal Data was disclosed. Please note that we process some categories of Personal Data in connection with targeted advertising. Additionally, depending on the Virginia consumer’s interactions with us, Company may not have collected or disclosed, or processed for purposes of targeted advertising, each of these categories about each individual.

<b>Category of Personal Data Collected/Processed</b>	<b>Categories of Third Parties to Whom Personal Data Is Disclosed</b>	<b>Processed for Targeted Advertising</b>
<b>Identifiers</b> , such as name, IP address, email address, and online and device identifiers	Service providers, Company Affiliates, and other providers or partners that support our operational business purposes	N/A
<b>Personal information</b> , such as contact information	Service providers, Company Affiliates, and other providers or partners that support our operational business purposes	N/A
<b>Internet or network activity information</b> , such as browsing history and interactions with our websites, mobile, or connected TV applications (collectively, “Company Digital Properties”)	Service providers, Company Affiliates, and other providers or partners that support our operational business purposes	N/A

<b>Geolocation data</b> , such as device location	Service providers, Company Affiliates, and other providers or partners that support our operational business purposes	N/A
<b>Audio, electronic, visual and other similar information</b> , such as call recordings	Service providers, Company Affiliates, and other providers or partners that support our operational business purposes	N/A
<b>Inferences drawn from any of the Personal Data listed above</b> to create a profile or summary about, for example, an individual's preferences and characteristics	Service providers, Company Affiliates, and other providers or partners that support our operational business purposes	N/A

Please note that the VCDPA definition of “sale” is the exchange of information for monetary consideration and does not include, for example, the transfer of Personal Data as an asset that is part of a merger, bankruptcy, or other similar transaction involving of all or any portion of our business. We do not “sell” Personal Data as defined under the VCDPA.

**Purposes.** We may use Personal Data for the following purposes:

- to operate, manage, and maintain our business, including in connection with a sale, acquisition, reorganization, merger, transfer of all or a part of our business, or other corporate transaction (e.g., a bankruptcy or similar proceeding);
- to provide our products and services;
- to accomplish our business purposes and objectives, including:
  - developing, improving, repairing, and maintaining our products and services;
  - personalizing, advertising, and marketing our products and services (including targeted advertising);
  - conducting research, analytics, and data analysis;
  - maintaining our facilities and infrastructure;
  - quality and safety assurance measures;
  - conducting risk and security controls and monitoring;
  - detecting and preventing fraud;
  - performing identity verification;
  - performing accounting, audit, and other internal functions;
  - complying with law, legal process, and internal policies;
  - maintaining records; and
  - exercising and defending legal claims.

Depending on the Virginia consumer's interactions with us, Otter Creek may not have used Personal Data collected about that resident for each of these purposes.

**Virginia Rights.** If you are a Virginia consumer, you have the following rights:

- (1) **Right to Access and Portability.** You have the right to request that we disclose to you the Personal Data we collected from you, including in a portable form.

To make a request for your Personal Data, please visit <https://fcprivacy.exterro.net/portal/dsar.htm?target=LiveNOWFOX> or call us at 888-596-3929. You will need to provide your name and email address, along with other details about your request. You will then receive verification instructions by email. In some circumstances, we may need additional information from you to verify your identity or proceed with your request.

You can use an authorized agent to submit a request for your Personal Data. When submitting a request online, your authorized agent should select the "Other" option on the form and, in the field provided, include your name, your email address, and whether or not you have an account/profile with us. In addition to verifying your identity, as described above, we also will need to verify your authorized agent's ability to act on your behalf (e.g., by receiving a copy of your signed permission). Once verification is complete, we may communicate directly with you for privacy and security reasons.

Please note that, in some instances, we may decline to honor your request where, for example, we are unable to verify your identity or an exception to this right applies.

- (2) **Right to Request Deletion.** You have the right to request that we delete Personal Data we collected from you or about you.

To make a request for deletion, please visit <https://fcprivacy.exterro.net/portal/dsar.htm?target=LiveNOWFOX> or call us at 888-596-3929. You will need to provide your name and email address, along with other details about your request. You will then receive verification instructions by email. Please note that you also will be asked to separately confirm that you would like to proceed with your deletion request. In some circumstances, we may need additional information from you to verify your identity or proceed with your request.

You can use an authorized agent to submit a request for deletion. When submitting a request online, your authorized agent should select the "Other" option on the form and, in the field provided, include your name, your email address, and whether or not you have an account/profile with us. In addition to verifying your identity, as described above, we also will need to verify your authorized agent's ability to act on your behalf (e.g., by receiving a copy of your signed permission). Once verification is complete, we may communicate directly with you for privacy and security reasons.

Please note that, in some instances, we may decline to honor your request where, for example, we are unable to verify your identity or an exception to this right applies.

- (3) **Right to Request Correction.** You have the right to request that we correct inaccurate Personal Data we collected about you.

To make a request for correction of inaccurate Personal Data, please visit <https://fcprivacy.exterro.net/portal/dsar.htm?target=LiveNOWFOX> or call us at 888-596-3929. You will need to provide your name, email address, and the Personal Data you would like to be corrected, along with other details about your request. You will then receive verification instructions by email. In some circumstances, we may need additional information from you to verify your identity or proceed with your request.

You can use an authorized agent to submit a request for correction of inaccurate Personal Data. When submitting a request online, your authorized agent should select the “Other” option on the form and, in the field provided, include your name, your email address, and whether or not you have an account/profile with us. In addition to verifying your identity, as described above, we also will need to verify your authorized agent’s ability to act on your behalf (e.g., by receiving a copy of your signed permission). Once verification is complete, we may communicate directly with you for privacy and security reasons.

Please note that, in some instances, we may decline to honor your request where, for example, we are unable to verify your identity or an exception to this right applies.

- (4) **Right to Appeal.** If you receive a denial of a personal data rights request and would like to request an appeal, please notify us through our privacy rights portal following the instructions provided with the denial of your request.
- (5) **Right to be Free from Discrimination.** You have the right to be free from unlawful discrimination for exercising your rights under the VCDPA.