

The Global Loyalty division of cxLoyalty Group Holdings was sold to JPMorgan Chase & Co. and will retain the brand as “cxLoyalty.” Please visit [cxLoyalty.com](http://cxLoyalty.com) for information about cxLoyalty. The Global Customer Engagement business is now TENERITY, and we will continue to deliver our technology, content, and servicing solutions to benefit our clients and the customer experience. Please see below for information about TENERITY’s privacy practices.

# Privacy Notice

Effective Date: **April 1, 2021**

This Privacy Notice explains how we collect, use, disclose, and otherwise process personal information in connection with our services. This Privacy Notice is not, however, a contract and does not create any legal rights or obligations.

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**Who We Are:** TENERITY creates compelling customer engagement solutions for clients and manages end-to-end engagement and membership programs that may be available to you. When we use the terms “TENERITY”, “we”, “us”, or “our” in this Privacy Notice, we are referring to TENERITY, LLC and its subsidiaries.

**Our Services:** When we use the term “services”, we are referring to our U.S.-facing Internet websites and our U.S.-facing end-to-end engagement and membership programs we offer and manage on our own behalf, including:

- Our U.S.-facing corporate websites that link to this Privacy Notice;
- U.S.-facing corporate websites that link to this Privacy Notice;
- Our retail and entertainment services;
- Our travel services;
- Our automotive services;
- Our homeowner services; and
- Our credit and identity benefit services.

This Privacy Notice does not cover or address:

- Disclosures or rights we may provide to you in relation to the Fair Credit Reporting Act (FCRA);
- Disclosures or rights we may provide to you in relation to the Gramm-Leach-Bliley Act (GLB);
- Disclosures or rights we may provide to you in relation to state-specific financial privacy laws;
- Offerings we make available in other countries;
- Offerings that we provide solely on behalf of our clients; or
- Personal information and privacy practices relating to job applicants, employees and other TENERITY personnel.

We make FCRA-related disclosures available on certain service-specific websites, and we separately provide GLB notices containing GLB and state-specific financial privacy law disclosures by mail or email in connection with GLB-covered services. If you would like to obtain another copy of a GLB notice previously provided, please contact us at [privacy@tenergy.com](mailto:privacy@tenergy.com).

For offerings provided on behalf of our clients, please refer to the privacy notice of the client with which you have a relationship for information on how they engage service providers, like us, to process personal information on their behalf.

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## State-Specific Disclosures

We may choose or be required by law to provide different or additional disclosures relating to the processing of personal information about residents of certain states. Please see below for disclosures that may be applicable to you:

- If you are a resident of the State of California in the United States, please [click here](#) for additional California-specific privacy disclosures.

- If you are a resident of the State of Nevada in the United States, please see below for additional Nevada-specific privacy disclosures:

Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt out of future sales of certain covered information that a website operator has collected or will collect about the resident. To submit such a request, please contact us at [privacy@tenerity.com](mailto:privacy@tenerity.com).

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## What is Personal Information?

When we use the term “personal information” in this Privacy Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you. It does not include aggregated or deidentified information that is maintained in a form that is not capable of being associated with or reasonably linked to you.

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## Our Collection and Use of Personal Information

The personal information we collect, the way we collect it and how we use it will depend on how you are interacting with us and the type of services you use.

### Website & Online Services

#### Collection of Personal Information

As is true of most digital platforms, we and our third-party providers collect certain personal information automatically when you visit or interact with our websites and other online services:

- **Log Data:** Including your internet protocol (IP) address, operating system, browser type, browser ID, the URL you entered and the referring page/campaign, date/time of your visit, the time you spent on our services and any errors that may occur during your visit to our services.
- **Analytics Data:** Including the electronic path you take to our services, through our services and when exiting our services, as well as your usage and activity on our services, such as the links, objects, products and benefits you view, click or otherwise interact with (also known as “Clickstream Data”).
- **Location Data:** Including your general geographic location based on the Log Data we collect or more precise location when permitted by law.
- **Application Data:** Some of our services offer mobile or browser applications to allow you to take advantage of our service offerings on the go and/or when visiting third-party websites and other online services. Certain of these applications also allow us to access more precise Location Data about you and collect information about your use and interactions with third-party websites and online services (including the products or services you are interested in or purchase) to better serve you.

For information about our and our third-party providers’ use of cookies and related technologies to collect information automatically on our online services, and the choices you may have in relation to those practices, please visit our [Cookie Notice](#).

In addition to the personal information we collect automatically, we also collect personal information directly from you through our websites and online services:

- **Newsletters and Email Communication:** Many of our websites and online services provide you an opportunity to sign up for our newsletters and email communications by providing your email address. We use your email address to communicate with you about our services and exciting developments at Tenerity, which may include marketing communications. Please see the [Your Communication Preferences](#) section below for additional information about opting out of our marketing communications.
- **Contact Us:** Our websites and online services provide individuals and representatives of prospective business customers and partners the ability to connect with us through an online web form that collects contact information (such as first and last name, email address, phone number, company name, and title with company), area(s) of interest or concern, and a custom message from you. We use this information to communicate with you in connection with your request, including corresponding with you about Tenerity’s services, offerings, customer service, business partnership opportunities or media inquiries.

Although we often collect the personal information described above directly from you, we also collect this information through service providers and other third parties that collect it on our behalf, such as communications providers, analytics providers, website hosting providers and

marketing providers. Please note that our systems may record personal information that you type into our websites and other online services even if you do not choose to submit it.

## **Use of Personal Information**

We use the personal information we collect through our websites and other online services to:

- Help to optimize your experience with our websites and other online services;
- Administer and improve our websites and other online services;
- Test different configurations of our websites and other online services;
- Diagnose errors and problems with our websites and other online services;
- Conduct research and analytics on visitor usage and activity trends relating to our websites and other online services;
- Remember you and the choices you have made in relation to our services;
- Connect you to the requests and transactions you make on our websites and other online services;
- Identify how you use our websites and other online services, determine products/services that may be of interest to you and customize our personalized offerings and marketing efforts accordingly;
- Provide you with news about products and services we offer;
- Deliver marketing communications and advertisements based on your interests and interactions with us;
- Assess the performance of marketing campaigns and facilitate remarketing efforts; and
- Respond to your comments and questions and provide customer service.

Please note that we link the personal information we collect through our websites and online services with the other personal information that we collect about you and may use it for the purposes we describe in more detail in the other sections of this Privacy Notice.

## **Surveys, Contest and Promotion Entries Collection of Personal Information**

From time to time we may provide you the opportunity to participate in surveys, contests and/or promotions. If you choose to participate, we will request personal information from you in connection with your entry, which typically includes:

- Contact Information: Such as your full name, email address, mailing address, telephone number, company name and title.
- Demographic Information: Such as your specific or approximate date of birth, age, gender or annual income.
- Survey, Contest or Promotion Entry: Including any personal information you choose to provide in connection with your survey, contest or promotion entry, such as products/services of interest or your satisfaction with us.

Although we often collect the personal information described above directly from you, we also collect this information through service providers and other third parties that collect it on our behalf, such as communications providers, analytics providers, survey, contest and promotion entry providers and marketing providers.

## **Use of Personal Information**

We use the personal information we collect in connection with surveys, contests, and promotions to:

- Learn how we can improve your experience with our services;
- Understand our customer/member base and the users of our services, including these service configurations and products that may be of interest to our customer base in the aggregate;
- Conduct research and analytics on our customer base, users of our services, and the performance of us and our services;
- Incorporate ideas from your responses into our business operations and customer service models;
- Improve and customize our services and product offerings to address the needs and interests of our aggregate customer/member base;
- Develop new services and product offerings;
- Contact and announce contest and promotion winners;

- Provide you with news about products and services we offer; and
- Deliver marketing communications and advertisements based on your interests and interactions with us.

Unless noted otherwise in our initial request, we may link the personal information we collect through your contest, promotion and survey responses with the other personal information that we collect about you and for the purposes we describe in the other sections of this Privacy Notice. The survey, contest, or promotion request you receive may contain additional details about how any personal information you provide may be used or otherwise processed.

## **Service Enrollment and Account Management Collection of Personal Information**

When you enroll in our services or create/maintain an account with us, we collect certain personal information from you, which may include:

- **Contact Information:** Including your full name, email address, mailing address and telephone number.
- **Joint Account Holder and Family Information:** Including the names of the joint account holders and/or your family members, when needed for the service, as well as the household indicator used to connect you to your family members in our systems.
- **Account Identifiers:** Including a username and password and/or member number, as well as artificial internal identifiers we assign to your account to allow our systems to connect account information stored in different databases and tables.
- **Security/Authentication Information:** Including an enrollment access code, order entry security pin, your mother's maiden name, date of birth and city of birth.
- **Payment Information:** Including payment status, billing address, billing phone number, credit/debit card name, number, expiration date and security code (CVV), check number, bank account number, transit routing number, payment dates, renewals and renewal period, billing history, card number history, and third-party payment identifiers and confirmations.
- **Account History:** Including the services of interest/purchase, the date and type of enrollment and/or account creation, account status, log in activity, account transactions and benefits, the services we provide to you, the rewards you earn in connection with our services, the alert messages you receive in connection with the services, enrollment and account errors, and the cancellation date and associated cancellation confirmation code if you choose to cancel your services.
- **Customer Service and Communication History:** Including your name, address, email, proof of purchase, Account Identifiers, Account History and the contents of your requests and your correspondence with us.
- **Communication Preferences:** Including your preferences for the ways in which we contact you (e.g., physical mail, email, text messages) and the frequency at which we reach out.

Although we often collect the personal information described above directly from you, we may also collect certain information through our business partners when you enroll through a partner that you already have a relationship with. In addition, we may also collect this information through service providers and other third parties that collect it on our behalf, such as communications providers, payment processors, payment system providers, and information technology providers.

**Note about Biometric Information:** Some of our mobile applications require you to log in to access your account. We may provide you the ability to log in using facial, fingerprint or other biometric recognition technology available through your mobile device. If you choose to utilize these login features, information about your facial geometry, your fingerprint or other biometric information will be collected by your mobile device for authentication purposes. We do not store or have access to this biometric information. Instead, your mobile device will perform the biometric authentication process and only let us know whether the authentication was successful. If the authentication was successful, you will be able to access the applicable mobile application without separately providing your account credentials.

## **Use of Personal Information**

We use the personal information we collect in connection with your enrollment and/or account to:

- Determine your eligibility for and/or proof of enrollment in our services;
- Create an account for the services you choose to enroll in or interact with;
- Authenticate your identity when you choose to log in or interact with us or our services;
- Process payment for the services you enrolled in and/or signed up for;
- Provide our services to you, including allowing you to place orders, redeem coupons and rewards, utilize benefits and incentives, and make service requests;

- Coordinate with business partners and other relevant third parties to provide you our services and the day-to-day operations relating to your enrollment and/or account;
- Communicate with you, including to provide you with customer service, answer your questions, share news about Tenerity with you, market our products and services to you, and notify you about your membership; and
- Prevent fraudulent or other harmful activity, which may result in certain individuals being unable to re-enroll in our services.

Please note that we link the personal information we collect in connection with your enrollment and/or account with the other personal information that we collect about you and may use it for the purposes we describe in more detail in the other sections of this Privacy Notice.

## **Retail and Entertainment Services**

### **Scope of Retail and Entertainment Services**

Our retail and entertainment services include (but are not limited to):

- Discounts and coupons for savings on products, gift cards, dining, entertainment and other activities;
- Cash back and rewards points on purchases made through our services; and
- Price, delivery and return guarantees, product protection plans and warranty extensions.

### **Collection of Personal Information**

When you use and interact with our retail and entertainment services, we collect personal information from you, our merchants, product/service vendors, payment processors, service providers and other third parties who collect personal information on our behalf, which may include:

- **Account Information:** If you have an account with us, we collect and use information, as described in the [Service Enrollment and Account Management](#) section above, from your account for enrollment in and facilitation of the services.
- **Contact Information:** Including your full name, email address, mailing address and telephone number.
- **Payment Information:** Including payment status, billing address, billing phone number, credit/debit card name, number, expiration date and security code (CVV), gift card numbers and redemptions, and third-party payment identifiers and confirmations.
- **Transaction Information:** Including transaction description, order number, date, time and location of purchase/transaction, merchants ordered from, products and services purchased, sale amount, and discount amount.
- **Shipping Information:** Including the recipient's name, email address, mailing address, and telephone number, the shipping number, estimated delivery date, actual delivery date and gift message, if any.
- **Coverage Information:** Including the products and activities covered by guarantees, protection plans and warranty extensions, the type and length of coverage provided, and claims made under the coverage.
- **Rewards Information:** Including cash back, points and other rewards earned/redeemed, earning/redemption statements, rewards status, rewards expiration dates, rewards earning cap status, and transaction identifiers used to connect your transactions to you to provide the associated benefits and rewards.
- **Service Profile Information:** Including products and services of interest, favorite merchants, wish list, cart activity, recently viewed products and services, and our understanding of your preferences and interests.
- **Feedback Information:** Including feedback and ratings you provide relating to our services, products, and rewards.

### **Use of Personal Information**

We use the personal information we collect in connection with our retail and entertainment services to:

- Provide and improve the services, offerings, products, and rewards that you request and we facilitate;
- Communicate with you regarding our services, offerings, products, and rewards (including by sending you service-related emails);
- Determine your preferences and interests to better serve you;
- Personalize your experience, including providing tailored promotions and marketing offers;

- Process payment for the services, offerings, products, and rewards that you request;
- Facilitate your transactions with our merchants, vendors, service providers and other third parties;
- Fulfill your orders and shipping requests;
- Process claims available under your existing coverage;
- Process the cash back, points and other rewards you earn and/or redeem;
- Provide customer support relating to the services, offerings, products and rewards;
- Conduct research and analytics on our customer base, users of our services, and the performance of us and our services;
- Improve and customize our services and product offerings to address the needs and interests of our aggregate customer/member base;
- Audit transactions conducted in connection with our services; and
- Investigate and prevent fraud in connection with your account and/or transactions.

Please note that we link the personal information we collect in connection with your retail and entertainment services with the other personal information that we collect about you and may use it for the purposes we describe in more detail in the other sections of this Privacy Notice.

## **Travel Services**

### **Scope of Travel Services**

Our travel services include (but are not limited to):

- Bookings and savings for flights, hotels, rental cars, cruises, and travel activities;
- Rewards accrual and redemption on travel products made available through our services; and
- Price guarantees, travel protection plans and insurance.

### **Collection of Personal Information**

When you use and interact with our travel services, we collect personal information from you, our travel booking providers, travel partners, payment processors, service providers and other third parties who collect personal information on our behalf, which may include:

- **Account Information:** If you have an account with us, we collect and use information, as described in the [Service Enrollment and Account Management](#) section above, from your account for enrollment in and facilitation of the services.
- **Contact Information:** Including your full name, email address, mailing address and telephone number.
- **Traveler Information:** Including your travel companions' names and relationships, as well as your and your travel companions' full legal name, age, date of birth, sex, gender, travel membership numbers, driver's license number, passport number and passport details (such as expiration date, country of nationality and issuing country), special accommodations or restrictions and events that you report occurring during your travel.
- **Payment Information:** Including payment status, billing address, billing phone number, credit/debit card name, number, expiration date and security code (CVV), and third-party payment identifiers and confirmations.
- **Flight Information:** Including flight confirmation numbers, frequent flyer number, airline name, airline brand name, flight number, departure date & time, arrival date & time, flight origin, flight destination, flight duration, departure airport code, arrival airport code, and seat number.
- **Hotel Information:** Including hotel confirmation numbers, hotel membership number, hotel name, hotel chain, check-in date, check-out date, and number of guests.
- **Rental Car Information:** Including rental car confirmation numbers, rental car membership number, rental car company, rental car, car pickup date & time, car drop-off date & time, car pickup location, and car drop-off location.
- **Cruise Information:** Including cruise confirmation numbers, cruise line, cruise ship, cruise departure date & time, cruise arrival date & time, cruise departure location and cruise arrival location.
- **Travel Activity Information:** Including travel activity confirmation number, travel activity name, travel activity description, travel activity start date, travel activity end date, and travel activity locations.
- **Coverage Information:** Including the travel and activities covered by guarantees, protection plans and warranty extensions, the type and length of coverage provided, and claims made under the coverage.

- **Rewards Information:** Including cash back, points and other rewards earned/redeemed, earning/redemption statements, rewards status, rewards expiration dates, rewards earning cap status, and transaction identifiers used to connect your transactions to you to provide the associated benefits and rewards.
- **Service Profile Information:** Including flights, hotels, rental cars, cruises and travel activities of interest, favorite travel providers, recently viewed travel opportunities and our understanding of your preferences and interests.
- **Feedback Information:** Including feedback and ratings you provide relating to our services, products, and rewards.

## **Use of Personal Information**

We use the personal information we collect in connection with our travel services to:

- Provide and improve the services, offerings, travel opportunities and rewards that you request and we facilitate;
- Communicate with you regarding our services, offerings, travel opportunities and rewards (including by sending you service-related emails);
- Determine your preferences and interests to better serve you;
- Personalize your experience, including providing tailored promotions and marketing offers;
- Determine your eligibility to travel and participate in travel activities, including fulfilling travel provider requirements;
- Process payment for the services, offerings, travel opportunities and rewards that you request;
- Facilitate your travel bookings with our travel booking providers, travel partners, service providers and other third parties;
- Fulfill your travel itineraries in accordance with travel provider requirements;
- Process claims available under your existing coverage;
- Process the cash back, points and other rewards you earn and/or redeem;
- Provide customer support relating to the services, offerings, travel opportunities and rewards;
- Conduct research and analytics on our customer base, users of our services, and the performance of us and our services;
- Improve and customize our services and travel offerings to address the needs and interests of our aggregate customer/member base;
- Audit transactions conducted in connection with our services; and
- Investigate and prevent fraud in connection with your account and/or transactions.

Please note that we link the personal information we collect in connection with your travel services with the other personal information that we collect about you and may use it for the purposes we describe in more detail in the other sections of this Privacy Notice.

## **Automotive Services**

### **Scope of Automotive Services**

Our automotive services include (but are not limited to):

- Roadside assistance;
- Auto repair, maintenance, and insurance discounts; and
- Car research services.

### **Collection of Personal Information**

When you use and interact with our automotive services, we collect personal information from you, our automotive service partners, payment processors, service providers and other third parties who collect personal information on our behalf, which may include:

- **Account Information:** If you have an account with us, we collect and use information, as described in the [Service Enrollment and Account Management](#) section above, from your account for enrollment in and facilitation of the services.
- **Contact Information:** Including your full name, email address, mailing address and telephone number.
- **Automotive Information:** Including your driver's license number, vehicle year, vehicle make, vehicle model, vehicle condition, covered drivers/passengers (including family members), automotive events you are seeking assistance with and the automotive services, products, and offerings purchased.

- **Payment Information:** Including payment status, billing address, billing phone number, credit/debit card name, number, expiration date and security code (CVV), and third-party payment identifiers and confirmations.
- **Location Information:** If you choose to use our LocateMe® Technology in connection with our roadside assistance offerings, we will record your vehicle's breakdown location when you call us from any wireless or landline phone, so we can dispatch one of our service providers to you faster and get you back on the road.
- **Service Profile Information:** Including automotive services, products, and offerings of interest, recently viewed products and services, and our understanding of your preferences and interests.
- **Feedback Information:** Including feedback and ratings you provide relating to our automotive services, products, and offerings.

## **Use of Personal Information**

We use the personal information we collect in connection with our automotive services to:

- Provide and improve the automotive services, products, and offerings that you request and we facilitate;
- Communicate with you regarding our automotive services, products, and offerings (including by sending you service-related emails);
- Determine your preferences and interests to better serve you;
- Personalize your experience, including providing tailored promotions and marketing offers;
- Process payment for the automotive services, products, and offerings that you request;
- Facilitate the automotive services, products, and offerings you purchase with our automotive partners, service providers and other third parties;
- Provide customer support relating to the automotive services, products and offerings;
- Conduct research and analytics on our customer base, users of our services, and the performance of us and our services;
- Improve and customize our automotive services, products, and offerings to address the needs and interests of our aggregate customer/member base;
- Audit transactions conducted in connection with our services; and
- Investigate and prevent fraud in connection with your account and/or transactions.

Please note that we link the personal information we collect in connection with your automotive services with the other personal information that we collect about you and may use it for the purposes we describe in more detail in the other sections of this Privacy Notice.

## **Homeowner Services**

### **Scope of Homeowner Services**

Our homeowner services include (but are not limited to):

- Shopping discounts and rewards;
- Moving discounts and support; and
- Home improvement and household item service guarantees and protection plans.

### **Collection of Personal Information**

When you use and interact with our homeowner services, we collect personal information from you, our homeowner services partners, payment processors, service providers and other third parties who collect personal information on our behalf, which may include:

- **Account Information:** If you have an account with us, we collect and use information, as described in the [Service Enrollment and Account Management](#) section above, from your account for enrollment in and facilitation of the services.
- **Contact Information:** Including your full name, email address, mailing address and telephone number.
- **Payment Information:** Including payment status, billing address, billing phone number, credit/debit card name, number, expiration date and security code (CVV), and third-party payment identifiers and confirmations.
- **Transaction Information:** Including transaction description, order number, date, time and location of purchase/transaction, merchants ordered from, products and services purchased, sale amount, and discount amount.

- **Shipping Information:** Including the recipient's name, email address, mailing address, and telephone number, the shipping number, estimated delivery date, actual delivery date and gift message, if any.
- **Coverage Information:** Including the services and household items covered by guarantees and protection plans, the type and length of coverage provided, and claims made under the coverage.
- **Rewards Information:** Including cash back and other rewards earned/redeemed, earning/redemption statements, rewards status, rewards expiration dates, rewards earning cap status, and transaction identifiers used to connect your transactions to you to provide the associated benefits and rewards.
- **Service Profile Information:** Including products and services of interest, recently viewed products and services, and our understanding of your preferences and interests.
- **Feedback Information:** Including feedback and ratings relating to our services, products, and rewards.

## **Use of Personal Information**

We use the personal information we collect in connection with our homeowner services to:

- Provide and improve the homeowner services, products, and offerings that you request and we facilitate;
- Communicate with you regarding our homeowner services, products and offerings (including by sending you service-related emails);
- Determine your preferences and interests to better serve you;
- Personalize your experience, including providing tailored promotions and marketing offers;
- Process payment for the homeowner services, products, and offerings that you request;
- Facilitate the homeowner services, products, and offerings you purchase with our homeowner partners, service providers and other third parties;
- Process claims available under your existing coverage;
- Provide customer support relating to the homeowner services, products and offerings;
- Conduct research and analytics on our customer base, users of our services, and the performance of us and our services;
- Improve and customize our homeowner services, products, and offerings to address the needs and interests of our aggregate customer/member base;
- Audit transactions conducted in connection with our services; and
- Investigate and prevent fraud in connection with your account and/or transactions.

Please note that we link the personal information we collect in connection with your homeowner services with the other personal information that we collect about you and may use it for the purposes we describe in more detail in the other sections of this Privacy Notice.

## **Credit & Identity Benefit Services**

### **Scope of Credit & Identity Benefit Services**

Our credit and identity benefit services include (but are not limited to):

- Record monitoring and reporting;
- Credit/debit card monitoring; and
- Identity theft and fraud prevention, monitoring and support services.

### **Collection of Personal Information**

When you use and interact with our credit and identity benefit services, we collect personal information from you, our credit and identity benefit providers, payment processors, service providers and other third parties who collect personal information on our behalf, which may include:

- **Account Information:** If you have an account with us, we collect and use information, as described in the [Service Enrollment and Account Management](#) section above, from your account for enrollment in and facilitation of the services.
- **Contact Information:** Including your full name, email address, mailing address and telephone number.
- **Payment Information:** Including payment status, billing address, billing phone number, credit/debit card name, number, expiration date and security code (CVV), and third-party payment identifiers and confirmations.

- **Credit and Identity Information:** Including your Social Security number, account numbers and status, and other credit/identity-related information needed to facilitate the delivery of credit reports, driver's record reports, publicly available record reports and other available reports for your review and the provision of the credit and identity benefit services you request.
- **Coverage Information:** Including the credit and identity benefits covered by our credit and identity monitoring services, the type and length of coverage provided, and claims made under the coverage.
- **Service Profile Information:** Including products and services of interest, recently viewed products and services, and our understanding of your preferences and interests.
- **Feedback Information:** Including feedback and ratings relating to our services, products, and rewards.

## **Use of Personal Information**

We use the personal information we collect in connection with our credit and identity benefit services to:

- Provide and improve the credit and identity benefit services, products, and offerings that you request and we facilitate;
- Communicate with you regarding our credit and identity benefit services, products, and offerings (including by sending you service-related emails);
- Determine your preferences and interests to better serve you;
- Personalize your experience, including using personal information other than Credit and Identity Information to provide tailored promotions and marketing offers;
- Process payment for the credit and identity benefit services, products, and offerings that you request;
- Facilitate the credit and identity benefit services, products, and offerings you purchase with our credit and identity partners, service providers and other third parties;
- Process claims available under your existing coverage;
- Provide customer support relating to the credit and identity benefit services, products and offerings;
- Conduct research and analytics on our customer base, users of our services, and the performance of us and our services;
- Improve and customize our credit and identity benefit services, products, and offerings to address the needs and interests of our aggregate customer/member base;
- Audit transactions conducted in connection with our services; and
- Investigate and prevent fraud in connection with your account and/or transactions.

Please note that we link the personal information we collect in connection with your credit and identity benefit services with the other personal information that we collect about you and may use it for the purposes we describe in more detail in the other sections of this Privacy Notice.

## **Other Collection of Personal Information**

In addition to the personal information collected above, we may also collect your personal information as follows:

- **Referrals:** We offer a referral service that allows you to tell one of your friends about our services by forwarding certain marketing communications and/or emails to an individual you believe may be interested in our products and services. We use personal information collected in connection with these referral services to communicate with the individual you are referring and to provide you any benefits, incentives and/or rewards you may be eligible for as a result of your referral.
- **Social Media:** If you choose to interact with us on social media, we may collect personal information about you from your social media account that you make public. We use personal information collected in connection with your social media account to communicate with you, better understand your interests and preferences, and better understand our customer base in the aggregate.
- **Business Partners:** Our business partners, such as our travel providers and product merchants, collect personal information in connection with our services and often share some or all of this information with us. For example, we receive information about transactions you complete on our business partners' websites through our services in order to count those transactions toward your cash back, bonus points or other rewards programs.
- **Service Providers:** Our service providers, such as payment processors and marketing providers, collect personal information and often share some or all of this information with us.

For example, we receive personal information from payment processors to confirm that your payment for the services was accepted.

- **Information Providers:** We may from time to time obtain information from third-party information providers to correct or supplement personal information we collect. For example, we may obtain updated contact information from third-party information providers to reconnect with you.
- **Inquiry Information:** If you choose to contact us, we will collect personal information in connection with your inquiry and correspondence with us. We may need additional information to fulfill your request or respond to your inquiry. We may provide additional privacy disclosures where the scope of the inquiry/request and/or personal information we require fall outside the scope of this Privacy Notice. In that case, the additional privacy disclosures will govern how we may process the information you provide at that time.
- **Publicly Available Information:** We may collect personal information from publicly available sources, such as government records or public review websites, to supplement the personal information identified above.

## Other Uses of Personal Information

In addition to the uses identified above, we use the personal information we collect to:

- Facilitate our day-to-day business operations, such as maintaining accounts and processing transactions;
- Develop new products and services, and improve existing products and services;
- Aggregate information we receive from you and third parties to help understand your needs, customize our services and offerings to you, and provide you better service;
- Conduct research and analytics designed to understand our customer base and improve our products, services, and customer experience;
- Prevent, investigate, or provide notice of fraud or unlawful or criminal activity;
- Enforce and carry out contracts and agreements; and
- Comply with legal obligations.

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## Our Disclosure of Personal Information

We disclose personal information in the following ways:

- **Within Tenuity:** We are able to offer you the products and services we make available because of the hard work of the entire Tenuity team. Tenuity entities disclose personal information to other Tenuity entities for purposes and uses that are consistent with this Privacy Notice and applicable law. For example, the Tenuity entity providing our services to you may share personal information relating to transactions with another Tenuity entity that provides the system used to review available offerings and complete transactions for the services we are providing.
- **Business Partners:** We often make our services available to customers and/or employees of our business partners. We may provide personal information to the relevant business partner to confirm your enrollment in the service.
- **Data Analytics Providers:** We share personal information with data analytics providers who analyze statistics and trends relating to the usage of and activity relating to our services. These data analytics providers produce reports and make suggestions for our customer and business strategy based on the personal information and other information analyzed.
- **Affiliate Networks and Merchants:** In order to facilitate your orders and provide you the rewards you are eligible to receive, we may disclose personal information to affiliate networks and merchants to enable them to fulfill your orders and identify which of their customers are connected to our services. For example, we often provide affiliate networks and merchants an online identifier showing that you were referred from our services to the affiliate network's and/or merchant's site and connecting your purchases to your rewards account.
- **Payment Processors and Online Payment Systems:** We share personal information with payment processors, online payment system providers and other billing agents to process your payment for the services and products you order, as well as to provide refunds, cash back and/or rebate checks.
- **Transaction Fulfillment and Delivery Providers:** We share personal information with transaction fulfillment and delivery providers in order to fulfill your transactions through our services and deliver the products and experiences that you order through our services.
- **Insurance and Coverage Providers:** We often engage insurance companies, financial institutions and other third parties to provide you with the guarantees, protection plans and extended

warranties made available through our services. In order for these third parties to administer and service your coverage in connection with the services, we share personal information about you with them.

- **Credit and Identity Benefit Providers:** In order to provide you our credit and identity benefit services, we often engage partners and service providers who specialize in different aspects of credit and identity monitoring and protection. We share personal information with these providers in order to facilitate their provision of credit and identity benefit services to you, including providing them sufficient personal information to compile the relevant reports about you needed for the service.
- **Marketing Partners:** We coordinate and share personal information with our marketing partners, including advertisement networks, social networks, re-targeting partners and marketing communication providers, in order to communicate with you about our products and services and market our products and services to you. We may also share aggregated demographic information with third parties interested in advertising on our online services to assist them in understanding the audience they would be reaching, but this information is not designed to be identifiable to a specific individual.
- **Customer Service and Communication Providers:** We share personal information with third parties who assist us in providing our customer service experience and facilitating our communications with you, including third parties that provide call center, email, and chat support services.
- **Other Service Providers:** In addition to the third parties identified above, we engage other third parties to perform certain functions on our behalf in connection with the uses of personal information described in the [Our Collection and Use of Personal Information](#) section above, including rewards tracking, communication printing, website hosting, information technology support, content development and fraud monitoring. Depending on the function the third party serves, the service provider may process personal information on our behalf or have access to personal information while performing functions on our behalf.
- **Public Disclosure:** With your consent, we may disclose certain personal information about you, such as first name/initial, last name and city of residence, publicly as an example of representative savings and/or to identify you as a user of our service.
- **Business Transaction or Reorganization:** We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal information to a third party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal information may also be disclosed in the event of insolvency, bankruptcy, or receivership.
- **Legal Obligations and Rights:** We may disclose personal information to third parties, such as legal advisors and law enforcement:
  - In connection with the establishment, exercise, or defense of legal claims;
  - To comply with laws and regulations or to respond to lawful requests and legal process;
  - To protect our rights and property and the rights and property of our agents, customers, and others, including to enforce our agreements, policies, and terms of use;
  - To detect, suppress, or prevent fraud;
  - To reduce credit risk and collect debts owed to us;
  - To protect the health and safety of us, our customers, or any person; or
  - As otherwise required by applicable law.
- **Consent:** We may disclose personal information about you to certain other third parties with your consent.

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## Your Communication Preferences

In connection with our services, we may send you email messages, direct mail offers, SMS messages, push notifications or other communications, including telephone calls, regarding our services. You may ask us not to send you marketing communications or request a change to the method or frequency of communication by:

- Following any available opt-out or communication preferences instructions in the marketing communications;
- When available, accessing the “Unsubscribe” or “Communication Preferences” settings in your account profile page;
- Sending a request to [service@tenerity.com](mailto:service@tenerity.com) with the words “Opt Out” or “Communication Preferences” in the subject line, the address or number at which we contacted you and your request; or

- Sending a request to the following address identifying the address or number at which we contacted you and your request:

**Tenerity  
Data Privacy Office  
6 High Ridge Park  
Stamford, CT 06905  
1-844-300-4222**

Please allow up to 10 days for your request to be processed. If you request to opt out of marketing communications, please note that we may continue to send you non-marketing communications, such as those directly related to the fulfillment of a specific transaction you requested, maintenance of your account or status of our ongoing business relations.

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## **Children’s Personal Information**

Our websites and online services are not directed to, and we do not intend to, or knowingly, collect or solicit personal information from children under the age of 13. If you are under the age of 13, please do not use our websites or online services or otherwise provide us with any personal information either directly or by other means. If a child under the age of 13 has provided personal information to us, we encourage the child’s parent or guardian to contact us to request that we remove the personal information from our systems. If we learn that any personal information, we collect has been provided by a child under the age of 13, we will promptly delete that personal information.

We do, however, process personal information about children, including their Social Security numbers, when it is necessary for the services we are offering, and you provide it to us. This personal information is used to provide you the full benefit of the service you have chosen, such as the protection of your child’s bank card or identity, coverage for your child under insurance products or for travel services such as flights, hotels or cruises.

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## **Third-Party Websites**

Our websites and online services may include links to or redirect you to third-party websites, plug-ins and applications, including social media services where you may connect with us. Third-party websites may also reference or link to our websites and online services. Except where we post, link to or expressly adopt or refer to this Privacy Notice, this Privacy Notice does not apply to, and we are not responsible for, any personal information practices of third-party websites and online services or the practices of other third parties. To learn about the personal information practices of third parties, please visit their respective privacy notices or policies.

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## **Updates to this Privacy Notice**

We will update this Privacy Notice from time to time. When we make changes to this Privacy Notice, we will change the “Effective Date” at the beginning of this Privacy Notice. If we make material changes to this Privacy Notice, we will notify you by prominent posting at the beginning of this Privacy Notice.

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## **Contact Us**

If you have any questions or requests in connection with this Privacy Notice or other privacy-related matters, please send an email to [privacy@tenerity.com](mailto:privacy@tenerity.com).

Alternatively, inquiries may be addressed to:

**Tenerity  
Data Privacy Office  
6 High Ridge Park  
Stamford, CT 06905  
1-844-300-4222**

# Additional California Privacy Disclosures

Effective Date: **April 1, 2021**

These Additional California Privacy Disclosures supplement the information contained in our [Privacy Notice](#) by providing additional information about how we collect, use, disclose, and otherwise process personal information of individual residents of the State of California within the scope of the California Consumer Privacy Act of 2018 (CCPA). Unless otherwise expressly stated, all terms defined in our [Privacy Notice](#) retain the same meaning in these Disclosures and all other terms defined in the CCPA and not otherwise defined in these Disclosures have the same meaning when used in these Disclosures.

## Personal Information Disclosures

When we use the term “personal information” in these Disclosures, we mean 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. It does not include aggregated or deidentified information that is maintained in a form that is not capable of being associated with or linked to you.

## Collection, Disclosure, and Sale of Personal Information

In the last 12 months, we have not sold personal information about you, but we have collected and disclosed for a business purpose the following categories and examples of specific pieces of personal information, which reference the personal information described in the [Our Collection and Use of Personal Information](#) section of our [Privacy Notice](#):

| Category of Personal Information   | Collected | Disclosed for Business Purpose | Sold*                        |
|--|-----------|--------------------------------|------------------------------|
| Identifiers, such as Account Identifiers, Credit and Identity Information relating to data used to identify you, full name, IP address, and government identification number (including Social Security number, passport number and driver's license number)   | ✓         | ✓                              | No Personal Information Sold |
| California Customer Records (Cal. Civ. Code § 1798.80(e)): including your Contact Information, Security/Authentication Information, Joint Account Holder and Family Information, Traveler Information, Automotive Information, Credit and Identity Information relating to your account, Account History relating to your account, Payment Information, Shipping Information relating to your account, Rewards Information relating to your account, Referrals, approximate income level and signature | ✓         | ✓                              |                              |
| Protected Classification Characteristics, including age, date of birth, gender, and sex  | ✓         | ✓                              |                              |
| Commercial Information, including Account History relating to your purchases, Transaction Information, Shipping Information relating to your purchases, Coverage Information, Flight Information, Hotel Information, Rental Car Information, Cruise Information, Travel Activity Information, Rewards Information relating to your purchases or redemption, Service Profile Information relating to your purchases and interests, and Feedback Information   | ✓         | ✓                              |                              |

|   |   |   |  |
|---|---|---|--|
| Biometric Information   |   |   |  |
| Internet/Network Information, such as Log Data, Analytics Data and Application Data   | ✓ | ✓ |  |
| Geolocation Data, including your general geographic location or more precise location when permitted by law (such as in connection with your use of our LocateMe® Technology for our automotive services)   | ✓ | ✓ |  |
| Sensory Information, including recordings of phone calls between you and us, where permitted by law   | ✓ | ✓ |  |
| Profession/Employment Information, including the business or organization you represent, your title with that business or organization and information relating to your role with the business or organization  | ✓ | ✓ |  |
| Non-Public Education Information (20 U.S.C. § 1232g, 34 C.F.R. Part 99)   |   |   |  |
| Other Personal Information, including Communication Preferences, Customer Service and Communication History, personal information you permit us to see when interacting with us through social media, and personal information you provide us in relation to a question, request, inquiry, survey, contest or promotion | ✓ | ✓ |  |
| Inferences, including our predictions about your interests and preferences and related Service Profile Information  | ✓ | ✓ |  |

\*Note about “Sales”: We do not and will not “sell” personal information as most people think of that term. However, we do utilize third-party providers to engage in online analytics and advertising involving the collection of personal information, including Identifiers, Internet/Network Information, and Geolocation Data, directly from your browser or device through cookies or related technologies when you visit or interact with our online services or otherwise engage with us online. We use these third-party providers to analyze and optimize our online services, provide more relevant content and ads to users of our online services and other third parties, and perform other services related to analytics or advertising consistent with these Disclosures and our [Privacy Notice](#). These third-party businesses may use the information they collect directly from you for their own purposes in accordance with their own privacy notices, which may include using this information for services provided to other third parties, including other parties operating in advertising networks.

To the extent that these practices qualify as “sales” under the CCPA, you may have the right to opt out as described in the [Your Privacy Rights](#) section below.

## Sources of Personal Information

As described in the [Our Collection and Use of Personal Information](#) section of our [Privacy Notice](#), we collect personal information directly from you when you provide it to us, automatically when you visit our websites and other online services, and from service providers and other third parties. For representatives of our clients, vendors, service providers and other third parties, we also collect personal information directly from you and from the entity you represent.

## Purposes for Collecting Personal Information

We collect personal information about you for the purposes described in the [Our Collection and Use of Personal Information](#) section of our [Privacy Notice](#). For representatives of our clients, vendors, service providers and other third parties, we also collect your personal information to maintain an ongoing relationship between us and the entity you represent and to contact you in connection with our relationship with the entity you represent.

## Recipients of Personal Information

As described in the [Our Collection and Use of Personal Information](#) section of our [Privacy Notice](#), we share personal information within Tenerity and with a variety of third parties. For representatives of our clients, vendors, service providers and other third parties, we also share your personal information with the entity you represent.

## Your Privacy Rights

As a California resident, you may be able to exercise the following rights in relation to the Personal Information about you that we have collected (subject to certain limitations at law):

|                             |   |
|-----------------------------|---|
| Right to Know               | <p>The right to request any or all of the following personal information we have collected and disclosed about you in the last 12 months:</p> <ul style="list-style-type: none"><li>• The specific pieces of personal information we have collected about you;</li><li>• The categories and specific pieces of personal information we have collected about you;</li><li>• The categories of sources of the personal information we have collected about you;</li><li>• The categories of personal information we have disclosed about you to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;</li><li>• The categories of personal information we have sold about you (if any), and the categories of third parties to whom this information was sold; and</li><li>• The business or commercial purposes for collecting or, if applicable, selling personal information.</li></ul> |
| Right to Deletion           | <p>The right to request the deletion of personal information we have collected from you, subject to certain exceptions.</p>   |
| Right to Opt Out            | <p>The right to direct us not to sell personal information we have collected about you to third parties.</p>  |
| Right to Non-Discrimination | <p>The right to be free from discrimination for exercising any of the rights described above.</p> <p>The right to non-discrimination does not prohibit us from offering you certain financial incentives that may result in different prices, rates or quality levels of products or services. In addition, please note that if the exercise of the rights described above limits our ability to process personal information (such as in the case of a deletion request), we may not be able to provide our products and services to individuals who exercise these rights, or to otherwise engage with such individuals going forward.</p>  |

## Submitting Requests

### To Exercise Your Right to Know or *Right to Deletion*

To submit a request to exercise your right to know or right to deletion, please submit a request by emailing us at [privacy@tenerity.com](mailto:privacy@tenerity.com) or by calling 1-844-300-4222.

Before processing your request, we will need to verify your identity and confirm you are a resident of the State of California. In order to verify your identity, we will generally either require the successful authentication of your membership, or the matching of sufficient information you provide us to the information we maintain about you in our systems. This process may require us to request additional personal information from you, including, but not limited to, your email, address, member number, product website name, and/or date of last interaction with customer service.

In certain circumstances, we may decline a request to exercise the right to know and/or right to deletion, particularly where we are unable to verify your identity.

### Authorized Agents

In certain circumstances, you are permitted to use an authorized agent (as that term is defined by the CCPA) to submit requests on your behalf through the designated methods set forth in these Disclosures where we can verify the authorized agent's authority to act on your behalf by:

- 1) For requests to know or delete personal information:
  - a) receiving a power of attorney valid under the laws of California from you or your authorized agent; or
  - b) receiving sufficient evidence to show that you have:
    - i) provided the authorized agent signed permission to act on your behalf;
    - ii) verified your own identity directly with us pursuant to the instructions set forth in these Disclosures; and
    - iii) directly confirmed with us that you provided the authorized agent permission to submit the
      - (a) request on your behalf.
- 2) For requests to opt out of personal information "sales": receiving a signed permission demonstrating your authorized agent has been authorized by you to act on your behalf.

## To Exercise Your Right to Opt Out

As described in the [Collection, Disclosure and Sale of Personal Information](#) section above, we utilize third-party partners and providers to engage in online analytics and advertising involving the collection of personal information, including Identifiers, Internet/Network Information, and Geolocation Data, directly from your browser or device through cookies or related technologies when you visit or interact with our online services or otherwise engage with us online. We use these third-party partners and providers to analyze and optimize our online services, provide more relevant content and ads to users of our online services and other third parties, and perform other services related to analytics or advertising consistent with these Disclosures and our [Privacy Notice](#). These third-party businesses may use the information they collect directly from you for their own purposes in accordance with their own privacy notices, which may include using this information for services provided to other third parties, including other parties operating in advertising networks.

To the extent that these practices qualify as “sales” under the CCPA, you may have the right to opt out as described above. Please see our [Cookie Notice](#) for more information about the choices and opt-out options you may have in relation to those practices.

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## Updates to These Disclosures

We will update these Disclosures from time to time. When we make changes to these Disclosures, we will change the “Effective Date” at the beginning of these Disclosures. If we make material changes to these Disclosures, we will notify you by prominent posting at the beginning of these Disclosures or our [Privacy Notice](#).

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## Contact Us

If you have any questions or requests in connection with these Disclosures or other privacy-related matters, please send an email to [privacy@tenerity.com](mailto:privacy@tenerity.com).

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