

Kikoff California Privacy Policy

Last Updated: 6/5/2024

Your privacy is important to us at Kikoff Inc. and its affiliates and subsidiaries (“**Kikoff**,” “**we**,” “**us**,” or “**our**”), and we are committed to safeguarding, preserving, and respecting your privacy rights. If you are a California resident, you have certain rights with respect to the collection, use, transfer, and processing of your personal information, as defined by the California Consumer Privacy Act (“CCPA”), Cal. Civ. Code § 1798.100 *et seq.*, as amended by the California Privacy Rights Act (“CRPA”), and implementing regulations.

This California Privacy Policy (“**Policy**”) describes how we collect, use, share, disclose, retain, and secure the personal information we gather about you through our website, <https://kikoff.com/> (the “**Site**”), and when you interact with us as a customer or otherwise (collectively, the “**Services**”) when you use our Site. We reserve the right to limit these rights where permitted under applicable law, including where your identity cannot be reasonably verified or to the extent your rights adversely affect the rights and freedoms of others.

What Information Do We Collect?

The below examples are illustrative examples from the CCPA and do not reflect the specific pieces of information we collect.

In the previous 12 months, we have collected the following categories of personal information:

Category ¹	Examples	Collected
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	Yes
B. Personal Information	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Yes

¹ Categories of personal information are as defined in Cal. Civ. Code. § 1798.140(v) (effective Jan. 1, 2023).

Category ¹	Examples	Collected
C. Protected Classification Characteristics Under California or Federal Law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Yes
D. Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
E. Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No
F. Internet or Other Similar Network Activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
G. Geolocation Data	Physical location or movements.	Yes
H. Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or Employment-Related Information	Current or past job history or performance evaluations.	Yes
J. Non-Public Education Information	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
K. Inferences Drawn of the Consumer	Inferences drawn from personal information identified above to create a profile about a consumer reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

Category ¹	Examples	Collected
<p>L. Sensitive Personal Information</p>	<p>Personal information that reveals (a) Social Security, driver's license, state identification card, or passport number; (b) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credential allowing access to an account; (c) precise geolocation; (d) racial or ethnic origin, religious or philosophical beliefs, or union membership; (e) the contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication; or (f) genetic data.</p> <p>Biometric information processed for the purpose of uniquely identifying a consumer, personal information collected and analyzed concerning a consumer's health, sex life, or sexual orientation.</p> <p>Some Sensitive Personal Information included in this category may overlap with other categories.</p> <p>Purposes for collection:</p> <p>The purposes for which Kikoff will collect or use your Sensitive Personal Information include:</p> <ul style="list-style-type: none"> ● To provide and manage our products and services that are offered to you. This includes opening accounts, processing transactions, support and maintenance of our products, payments and collections, and account notifications ● To approve or decline account applications ● To service products and services you have with Kikoff ● For the purpose of conducting due diligence and KYC checks to comply with anti-money laundering ("AML") regulations to prevent money laundering and terrorist financing, as permitted by law. <p>Is the Sensitive Personal Information sold or shared?</p> <p>Kikoff does not sell your Sensitive Personal Information.</p> <p>Kikoff may disclose your personal information to a contractor or service provider for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.</p>	<p>Yes</p>

Sources From Which Personal Information Is Collected

We collect your personal information directly from you, from your interaction with the Site, from publicly available sources, and from third parties which collect the personal information directly from you.

We keep your personal information for as long as it's needed to provide the services you've asked for, fulfill transactions, meet legal requirements, settle disputes, enforce agreements, and for other legitimate business reasons. The exact duration can differ depending on factors like the type of data, user consent, data sensitivity, availability of automated deletion controls, and our legal or contractual obligations.

Any personal information we won't keep will be securely disposed of through methods like shredding, erasing, or altering the records to render the information unreadable or incomprehensible by any means.

Ensuring the security of all information related to our Services is a top priority. We utilize technology on our servers to establish a secure connection between your device and our servers, ensuring a private session.

To safeguard our servers from external threats, we employ firewalls and other security measures, securely storing your personal data. Access to this information is restricted to authorized personnel or third parties only on a need-to-know basis through secure web pages. Our data security protocols are aligned with industry standards aimed at protecting nonpublic personal information.

We implement reasonable measures to protect and secure your personal information. Nonetheless, it's important to note that no method of data transmission or storage can be guaranteed to be entirely secure against all potential threats.

Business or Commercial Purposes for Which Personal Information Is Collected

Your personal information is used for the following purposes:

- To provide you with the Services and related customer service, including communicating with you as necessary in connection with your application for financial products and services;
- To market our products and services to you
- To respond to your inquiries, comments, feedback, or questions;
- To send administrative information to you, for example, information regarding the Services, and changes to our terms, conditions, and policies;
- To analyze how users interact with our Services so we can provide, maintain, customize, and improve the content and functionality of the Services;
- To enforce the terms of our Terms of Use or Privacy Policy or any other agreement between us;
- To prevent actual or potential fraud, criminal, illegal, wrongful, or harmful activity, or misuses of our Services, and to ensure the security of our IT systems, architecture and networks;
- To comply with legal obligations and legal process and to protect our rights,

- privacy, safety or property, and/or that of our affiliates, you or other third parties;
- To conduct and publish market research, e.g., consumer surveys, polls, statistics etc;
- To publish user-generated content for use on our Site, social media, or other marketing platforms, websites, or mobile apps
- Any other purpose disclosed at the time you provide information or otherwise with your consent or if you authorize or direct us to release information about you.

Third Parties with Whom Personal Information Is Disclosed, Shared, or Sold

In the preceding 12 months, we have disclosed the following personal information about consumers for business purposes:

- We share personal information in categories A (identifiers), B (personal), C (protected class), F (Internet or Other Similar Network Activity), and L (Sensitive Personal Information) with service providers.
- We share personal information with vendors and service providers who provide services such as banking and communication infrastructure, operating systems and platforms, website hosting, storage, legal expertise, tax expertise, information technology, order fulfillment, data analytics, and customer service to provide the Products and Services to you.

In the preceding twelve (12) months, Kikoff has not sold the personal information of any consumer for monetary consideration. Our use of cookies and other tracking technologies may be considered a sale of personal information under the CCPA. Categories of personal information that we have shared under the CCPA include identifiers (e.g. IP addresses), commercial information (e.g. purchase history), and Internet or other similar network activity. Categories of third parties to whom personal information is shared under the CCPA include data analytics providers

In the preceding twelve (12) months, Kikoff has not knowingly sold personal information of consumers under the age of sixteen (16) years of age.

We do not have actual knowledge that we sell or share the personal information of consumers under sixteen (16) years of age.

Individual Rights

a. Right to Know About Personal Information Collected, Disclosed, Shared, or Sold You have the right to request that we disclose the personal information we collect, use, and disclose about you to third parties. There are two types of Rights to Know requests that you can make:

1. Right to Know (Abbreviated Request): If you make a Right to Know (Abbreviated Request), you will receive the following information about you:
 - a. Categories of personal information collected, sold, or shared;
 - b. Categories of sources from which personal information is collected;
 - c. Categories of third parties to whom the information is sold, shared or disclosed;
 - d. Business or commercial purpose for collecting, sharing, or selling personal information;
 - e. Categories of personal information disclosed for a business purpose and categories of persons to whom it was disclosed for a business purpose.
2. Right to Know (Specific Pieces of Information Request): If you make a Right to Know (Specific Pieces of Information Request), you will receive the following information about you:
 - a. Specific pieces of personal information collected about you.

This information will be provided to you free of charge, unless we determine that your request is manifestly unfounded or excessive. You may request this information twice in a 12-month period.

There are certain exceptions to a consumer's Right to Know. We will state in our response if an exception applies.

b. Right of Deletion

You have the right to request that we and our service providers delete any personal information about you which we have collected from you upon receipt of a verifiable request. This right is subject to certain exceptions. We will state in our response if an exception applies.

c. Right to Opt-Out of the Sale or Sharing of Personal Information

You have the right to opt-out of the sale or sharing of your personal information by a business subject to certain laws and regulations.

We recognize the Global Privacy Control. Your browser must be able to support the Global Privacy Control for us to recognize your opt-out preference signal.

Please note that opt-out choices may be stored via cookies. If you clear cookies, if your browser blocks cookies, or if you view the page from a different browser or device, your opt-out choice may no longer be logged or recognized.

For more information, please see our [Do Not Sell or Share My Personal Information](#) page.

d. Right to Non-Discrimination

You have the right not to receive discriminatory treatment for exercising the privacy rights conferred by California law. We will not discriminate against you because you exercised any of your privacy rights, including, but not limited to, by: denying goods or services to you; charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing a different level of quality of goods or services to you; or suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services. We will also not retaliate against any employee, applicant for employment, or independent contractor for exercising their rights under the CCPA.

e. Right of Correction

If we maintain inaccurate personal information about you, then you have the right to request that we correct the inaccurate personal information upon receipt of a verifiable request. Taking into account the nature of the personal information and purposes of processing the personal information, you have the right to request that we correct inaccurate personal information about you, if applicable.

f. Right to Limit Use and Disclosure of Sensitive Personal Information

If we collect Sensitive Personal Information (as defined in Cal. Civ. Code § 1798.140(ae) (effective Jan. 1, 2023)) about you with the purpose of inferring characteristics about you, then you have the right to request that we limit the use of such information to the use which is necessary to perform the services we offer or for other permitted purposes under Cal. Civ. Code § 1798.121 (effective Jan. 1, 2023) upon receipt of verifiable request.

g. Submitting Requests

You can submit your request by emailing us at help@kikoff.com.

h. Verifying Requests

To ensure the protection of your personal information, we must verify that the individual submitting a request to know, request to delete, or request to correct is the consumer to whom the request relates prior to processing the request. To verify a California consumer's identity, we may request up to three pieces of personal information about you when you make a request to compare against our records. We may also request that you sign a declaration under the penalty of perjury from the consumer whose personal information is the subject of the request.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in your request to verify your identity and will delete any information you provide after processing the request. We reserve the right to take additional steps as necessary to verify the identity of California consumers where we have reason to believe a request is fraudulent.

i. Authorized Agents

You may choose a person or a business registered with the California Secretary of State that you authorize to act on your behalf to submit your requests ("Authorized Agent"). If you choose to use an Authorized Agent, we require that you provide the Authorized Agent with written permission to allow them to submit your request and that you verify your identity directly with us. Failure to do so may result in Kikoff denying your request.

Contact Us

If you have any questions about this Policy, please contact us by email at help@kikoff.com.