

Privacy Policy

Last Updated: September 14, 2023

This Privacy Policy (“Policy”) describes how Pango Group and its subsidiaries and affiliates (collectively, “Pango Group,” “we,” “us,” or “our”) collect, use, store, and share your information when: (1) when you access or use our websites, mobile applications, web-based applications, or other digital platforms where this Policy is posted (“Sites”); (2) when you use our products and services (“Services”); (3) when you communicate with us in any manner, including by e-mail, in-person, telephone, or other communication method (“Communications”); and (4) when we obtain your information from third parties, including service providers, business partners, and governmental departments and agencies (“Third Parties”).

This Policy applies wherever it is posted. To the extent a Pango Group subsidiary or affiliate has different privacy practices, such entity shall have their own privacy statement posted as applicable.

What Type of Information Do We Collect About You?

Depending upon how you interact with our Sites and Services, the nature of your Communications, and the nature of our interaction with Third Parties, we may collect the following information from and about you:

- Direct identifiers, including but not limited to your unique online identifier, name, alias, social media handle, IP address, username and password, postal and/or e-mail address, account name and/or account number, social security number, driver’s license number, passport number, and/or state identification number.
- Related identifiers, including but not limited to your date of birth, bank, credit, or debit card number, financial information, insurance policy number, and/or license plate information.
- Physical characteristics, including protected characteristics under federal and state law, such as age, sex, race, and ethnicity.
- Commercial information, including records of products or services purchased, obtained, or considered, and other purchasing and consuming histories and tendencies.
- Biometric information, such as fingerprints.
- Internet or other electronic network activity information, with our Websites, Applications, and communications, and including browser type and version, browser settings, operating systems and platform, device type, operating information, mobile carrier, and page response time and download errors.
- Geolocation data, such as your zip code and time zone.
- Audio, electronic, visual, and thermal information, including telephone recordings, electronic communication records, security camera footage from applicable Pango Group properties, and temperature reading.
- Professional or employment-related information, such as your work history, salary history, and education history.

How Do We Collect Your Information?

We collect your information in three ways:

Directly from you when you access or use our Applications, Websites, Products or Services, or when you communicate with us in any manner, including but not limited to:

- Information you provide by filling out forms in person or electronically through our Applications and/or Websites, including information provided at the time of registering for any Product, Service or event, posting material, or requesting further services or information;
- Information you provide when you access or use our Products or Services;
- Information you provide when you enter a sweepstakes, contest or promotion sponsored or offered by us;
- Information you provide when you report a problem with our Applications or Websites;
- Records and copies of your correspondence (e.g., email address) if you contact us;
- Your responses to surveys that we might ask you to complete;
- Details of transactions you carry out through our Applications, Websites, and the fulfillment of your orders; and
- Your search queries on the Websites.

Automatically when you access or use our Applications, Websites, Products or Services, or when you communicate with us, including but not limited to:

- Details of your visits to the Websites and Applications, including traffic data, location data, logs and other communication data;
- Information about your computer and mobile device, and internet connection, including your IP address, operating system, and browser type; and
- Interactivity with an e-mail, including opening, navigating, and click-through information.

From third parties, including but not limited to:

- Data analytics providers for the purpose of receiving statistical data about your activity on our Websites and Applications;
- Social media networks for the purpose of collecting certain of your social media profile information and activity, including your screen names, profile picture, contact information, contact list, and the profile pictures of your contacts, through the social media platform;
- Third Party Service Providers, including but not limited to internet service providers, fraud prevention services, and related partners; and
- Public sources, including local, state, and federal government agencies and departments, to facilitate your use of the Websites and Applications, and to provide you with our Products or Services.

How Do We Use Your Information?

We use the information outlined in [What Type of Information Do We Collect About You](#) for a variety of business and commercial purposes, including but not limited to:

- | | |
|---|--|
| <ul style="list-style-type: none"> • Provide the Applications and Websites to you; • Provide the Products you have requested; • Fulfill a transaction you requested or service your policy; • Handle a claim; • Create and manage your account; • Operate the Applications and Websites, including access management, payment | <ul style="list-style-type: none"> • processing, Application and/or Website administration, internal operations, troubleshooting, data analysis, testing, research, and for statistical purposes; • Respond to your requests, feedback, or inquiries; • Comply with laws, regulations, and other legal requirements; • Comply with relevant industry standards and our policies; |
|---|--|

- Protect and enforce your rights and the rights of other users against unlawful activity, including identity theft and fraud;
- Protect and enforce our collective rights arising under any agreements entered between Pango Group and you or any other third party;
- Protect the integrity and maintain security of our Applications, Websites, and Products;
- Operate, evaluate, and improve our business; and
- Provide you with information and advertisements about products, services, and promotions, from us or affiliates, that may interest you.
- Deliver content tailored to your interests and the way you use the Applications and/or Websites;
- Present content in a manner that is optimized for your device;
- Measure and analyze the effectiveness of the Applications, Websites, and Products we provide to you.

How Do We Share Your Information?

We do not sell your personal information. We may, however, disclose or share information referenced in [What Type of Information Do We Collect About You](#) with others for a variety of business and commercial purposes, including:

- **With your consent.** We may disclose or share your information with your consent. We may obtain your consent in writing; online, through “click-through” agreements; when you accept the terms of use on our Applications or Websites; orally, either in person or on the phone; or by other means.
- **In a business transfer.** We may disclose or share your information as part of a corporate business transaction, such as a merger or acquisition, joint venture, corporate reorganization, financing, or sale of company assets, or in the unlikely event of insolvency, bankruptcy, or receivership, in which such information could be transferred to third parties as a business asset in the transaction.
- **To non-affiliated third parties.** We may disclose or share your information with certain third parties to facilitate your access and use of our Websites, Applications, and Products, including but not limited to internet service providers, advertising networks, data analytics providers, governmental entities, operating systems and platforms, social medial networks, and service providers who provide us a service (e.g., credit / debit card processing, billing, shipping, repair, customer service, auditing, marketing, debugging to identify and repair errors that impair existing intended functionality on our Websites, Applications, or Products, and/or protecting against malicious, deceptive, fraudulent, or illegal activity).
- **To subsidiaries and affiliates.** We may disclose or share your information with our Pango Group subsidiaries and affiliates to further facilitate your use of our Applications, Websites, and Products, and to ensure the smooth and consistent operations of Pango Group by identifying and repairing errors that impede intended functionality and to protect against malicious, deceptive, fraudulent, or illegal activity.

- **For legal process and protection.** We may disclose or share your information to satisfy any law, regulation, legal process, governmental request, or where we have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to:
 - Enforce or apply agreements, or initiate, render, bill, and collect for Products;
 - Protect our rights or interests, property or safety or that of others;
 - In connection with claims, disputes, or litigation - in court or elsewhere;
 - Protect users of our Applications, Websites, and Products and other carriers or providers from fraudulent, abusive, or unlawful use of, or subscription to, such services; and
 - Facilitate or verify the appropriate calculation of taxes, fees, or other obligations due to a local, state, or federal government.

[Links To Third Party Sites](#)

Our Applications and Websites may contain links to third party websites and services. Please note that these links are provided for your convenience and information, and the websites and services may operate independently from us and have their own privacy policies or notices, which we strongly suggest you review. This Privacy Notice applies to our Applications and Websites only, and we do not accept any responsibility or liability for the policies or practices of any third parties.

[Third Party Tracking / Do Not Track](#)

Our Websites and Applications may, from time to time, collect information about your online activities, over time and across our different Websites and Applications. When you use our Websites and Applications, third parties may also collect information about your online activities, over time and across different internet websites, online or cloud computing services, online applications, or mobile applications. Some browsers support a “Do Not Track” feature, which is intended to be a signal to websites that you do not wish to be tracked across different websites you visit. Our Websites do not currently change the way they operate based upon detection of a “Do Not Track” or similar signal.

[Social Media Integration](#)

Our Applications, Websites, and/or Products may, from time to time, contain links to and from social media platforms. You may choose to connect to us through a social media platform, such as Facebook or Twitter. When you do, we may collect additional information from or about you, such as your screen names, profile picture, contact information, contact list, and the profile pictures of your contacts, through the social media platform. Please be advised that social media platforms may also collect information from you. We do not have control over the collection, use and sharing practices of social media platforms. We therefore encourage you to review their usage and disclosure policies and practices, including their data security practices, before using the social media platforms.

[How Do We Store and Protect Your Information?](#)

Although no system can guarantee the complete security of your information, we take all commercially reasonable steps to ensure your information is protected in alignment with all applicable laws and regulations, as appropriate to the sensitivity of your information.

[How Long Do We Keep Your Personal Information?](#)

We keep your information for as long as necessary in accordance with the purpose for which it was collected, our business needs, and our legal and regulatory obligations. If we dispose of your information, we will do so in a way that is secure and appropriate to nature of the information subject to disposal.

Cookies and Related Technology

We may use browser cookies, beacons, pixel tags, scripts, and other similar technologies from time to time to support the functionality of our Applications, Websites, and Products. A cookie is a piece of information contained in a very small text file that is stored in your Internet browser or elsewhere on your hard drive. Cookies are transferred from our Websites and Applications to your computer, phone or tablet, and allow us to identify your device whenever you return to our Website or Application. These technologies provide a better experience when you use our Applications, Websites, and Products, and allow us to improve our services. We may also use analytic software, such as Google Analytics and others, to help better understand how our Applications and Websites function on your device(s) and for other analytical purposes. To learn more about how Google uses data when you use our Applications and Websites, see [How Google uses data when you use our partners' sites or apps](#). You can opt-out of Google Analytics by installing Google's opt-out browser add-on here <https://tools.google.com/dlpage/gaoptout>.

Below is an overview of the types of cookies and related technology we deploy, and your choices.

Browser Cookies. A browser cookie is a small file placed on the hard drive of your computer. That cookie then communicates with servers, ours or those of other companies that we authorize to collect data for us and allows recognition of your personal computer. You may use the tools available on your computer or other device(s) to set your browser to refuse or disable all or some browser cookies, or to alert you when cookies are being set. However, if you refuse or disable all browser cookies, you may be unable to access certain parts or use certain features or functionality of our Applications and Websites. Unless you have adjusted your browser settings so that it refuses all cookies, we may use cookies when you direct your browser to our Applications and Websites.

Beacons. Our Websites and e-mails may contain small electronic files known as beacons (also referred to as web beacons, clear GIFs, pixel tags and single-pixel GIFs) that permit us to, for example, to count users who have visited those pages or opened an e-mail and for other website-related statistics. Beacons in e-mail marketing campaigns allow us to track your responses and your interests in our content, offerings and web pages. You may use the tools in your device to disable these technologies as well.

Third Party Technology. Our service providers, advertising partners, and ad networks may also use cookies and beacons to collect and share information about your activities both on our Websites and Applications and on other websites and applications. In addition, third parties that are unaffiliated with us may also collect information about you, including tracking your browsing history, when you use our Applications and Websites. We do not have control over these third-party collection practices. If you wish to minimize these third-party collections, you can adjust the settings of your browsers or install plug-ins and add-ins.

Your Choices. You may wish to restrict the use of cookies or completely prevent them from being set. Most browsers provide for ways to control cookie behavior, such as the length of time they are stored. If you disable cookies, please be aware that some of the features of our Websites may not function correctly. To find out more on how to manage and delete cookies, visit www.aboutcookies.org. For more details on your choices regarding use of your web browsing activity for interest-based advertising, you may visit the following sites:

- <http://networkadvertising.org/>
- <http://optout.aboutads.info/>
- <http://youradchoices.com/>

Your Choices

We provide you the ability to exercise certain controls and choices regarding our collection, use, storage, and sharing of your information. For California residents, please click [here](#) to understand how to exercise your rights.

- **Right of Correction**. Regardless of where you live, you may submit a request that we correct or update the information we have about you.
- **Right to Change Preferences**. Regardless of where you live, you may change your choices for subscriptions, newsletters, and alerts.
- **Right to Control Advertising and Online Tracking**. Regardless of where you live, you have a right to control how your information is tracked online. To learn more about these rights, see [Cookies and Related Technologies](#).
- **Right of Non-Discrimination**. You have a right to exercise your rights under this section free of discrimination. Pango Group will not discriminate against you in any way if you choose to exercise your rights under this section.

California Consumer Privacy Act Rights and Disclosures

The following disclosures are made pursuant to the California Consumer Privacy Act, as amended by the California Privacy Rights Act and its implementing regulations (“CCPA”).

Relevant CCPA Definitions

Term	Definition
Personal information	Information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you or your household.
Sensitive personal information	Social security number, driver’s license number, state identification card, passport number, account log-in and password, financial account and password, debit or credit card number and access code, precise geolocation information, race, ethnic origin, religious or philosophical beliefs, union membership, the content of your mail, email or texts other than those communications with us, genetic data, biometric information, health information, and information that concerns your sex life or sexual orientation.
Sell, sale, or sold	Selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or other means, your personal information to a third party for money or other valuable consideration.

Notice at Collection

Below is a summary of the categories of personal information we have collected from and about you in the twelve months preceding the date this Privacy Policy was last updated. Also included in this description is information about: (1) why the information is collected and used; (2) whether the information is “sold” or “shared” to third parties; (3) whether the information is disclosed for a business purpose to

third parties; (4) whether the information includes “sensitive personal information”; (5) and a description of how long we may keep your information.

Categories of Personal Information:

- **Identifiers (Includes Sensitive Personal Information):** Includes information such as your name, alias, postal address, and telephone number, unique personal identifier, online identifier, IP address, account log-in, email address, account name, social security number, driver’s license number, passport number.
- **Personal Characteristics (Includes Sensitive Personal Information):** Includes information such as your signature, race, color, national origin, sex, sexual orientation, gender, gender identity, gender expression, religious creed, mental disability, physical disability, medical condition, military / veteran status, marital status, age, genetic characteristics, ancestry, or reproductive health decision making.
- **Financial Information (Includes Sensitive Information):** Includes information such as bank account number, credit card number, debit card number, or any other financial information with a required access or security code, password, or credentials.
- **Internet or other Electronic Network Activity Information:** Includes information such as network activity information, browsing history, search history, and information regarding your interaction with an Internet website, application, or advertisement.
- **Commercial Information:** Includes information such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Biometric Information (Includes Sensitive Personal Information):** Includes information such as fingerprints, handprints, facial recognition data, and voice recordings.
- **Professional and Educational Information (Includes Sensitive Personal Information):** Includes information that is not “publicly available personally identifiable information,” current or prior job history or performance evaluations.
- **Audio, Electronic, Visual, Thermal, and Related Information:** Includes information such as photographs, video recordings, recorded messages, and in some cases personal temperature where appropriate.

Category Disclosure Information

Disclosure	Categories	Description
How do we collect this information?	Identifiers*	We collect this information directly from you or automatically from your device(s). We also may collect this information from third parties such as service providers and government agencies.
	Personal Characteristics*	We collect this information directly from you. We also may collect this information from third parties, such as service providers.
	Financial Information*	
	Internet or other Electronic Activity Information	We collect this information directly from you or automatically from your device(s). We also may collect this information from third parties such as service providers.
	Commercial Information	
	Biometric Information*	

	Professional and Educational Information*	We collect this information directly from you. We also may collect this information from third parties such as service providers and government agencies.
	Audio, Electronic, Visual, Thermal and Related Information	We collect this information directly from you or automatically from your device(s). We also may collect this information from third parties such as service providers.
Does this include sensitive personal information?	*Denotes which categories may include sensitive personal information. We do not process your sensitive personal information other than for the purposes permitted under the CCPA.	
Is the information "sold" or "shared"?	No. To the extent any Pango Group affiliated entity has a different practice, it will be stated in the applicable privacy policy posted for the particular affiliated entity.	
What is our business purpose for collecting your information?	See How Do We Use Your Information above.	
Who do we disclose this information to?	See How Do We Share Your Information above.	
How long do we keep the information?	We keep the information for so long as is reasonably necessary and proportionate to the original purpose for which we collected the information. We base our criteria in determining appropriate retention periods on regulatory and legal requirements, contractual requirements, business needs, and the expectations of you.	

[Notice of Disclosure for a Business Purpose](#)

To learn more about the categories of personal information we have disclosed for a business purpose about California residents over the last twelve months, including the categories of third parties with whom we have shared that information, please see [What Type of Information Do We Collect About You](#) and [How Do We Share Your Information](#).

[Notice of Sale or Sharing](#)

We do not sell or share personal information as defined under the CCPA, nor have we sold or shared such personal information in the past 12 months. **To the extent any Pango Group affiliated entity has a different practice, it will be stated in the applicable privacy policy posted for the particular affiliated entity.** We have no actual knowledge of selling the personal information of minors under the age of 16.

[Notice of Processing Sensitive Personal Information](#)

Pango Group does not process your sensitive personal information outside of the permissible purposes set forth in the CCPA.

[Your Rights](#)

Under CCPA and its implementing regulations, you have a **Right to Know, Right to Correct, Right to Delete, and Right to Non-Discrimination.** We provide you the ability to exercise certain controls and choices regarding our collection, use, storage, and sharing of your information. Please note that for some of these rights, such as the Right to Know, Right to Correct, and Right to Delete, we will verify your identity before we respond to your request. To verify your identity, we will generally match the identifying information provided in your request with the information we have on file about you. Depending on the sensitivity of the personal information requested to be deleted, we may also utilize more stringent

verification methods to verify your identity, including but not limited to requesting additional information from you and/or requiring you to sign a declaration under penalty of perjury.

- **Right to Know**. You have a right to ask that we disclose to you the categories and specific pieces of personal information we have collected about you including a description of the categories of sources from which we have collected that information, the business or commercial purpose for collecting or sharing that information, and the categories of third parties with whom we have shared that information. You may submit this request by [clicking here](#) or by calling us at 1-323-364-5541. You may designate an authorized agent to submit a request on your behalf by [clicking here](#) or by calling us at 1-323-364-5541 and following the appropriate instructions.
- **Right to Correct**. You have a right to ask that we correct your personal information, subject to appropriate legal exceptions. You may submit this request by [clicking here](#) or by calling us at 1-323-364-5541. You may designate an authorized agent to submit a request on your behalf by [clicking here](#) or by calling us at 1-323-364-5541 and following the appropriate instructions.
- **Right to Delete**. As a California resident, you have a right to ask that we delete your personal information, subject to appropriate legal exceptions. You may submit this request by [clicking here](#) or by calling us at 1-323-364-5541. You may also designate an authorized agent to submit a request on your behalf by [clicking here](#) or by calling us at 1-323-364-5541 and following the appropriate instructions.
- **Right of Non-Discrimination**. You have a right to exercise your rights under this section free of discrimination. Pango Group will not discriminate against you in any way if you choose to exercise your rights under this section.

California Minors

If you are a California resident under the age of 18, California Business and Professions Code § 22581 permits you to request and obtain removal of content or information you have publicly posted on any of our Applications or Websites. To make such a request, please send an email with a detailed description of the specific content or information to dataprivacy@pangogroup.com. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and there may be circumstances in which the law does not require or allow removal even if requested.

Children

Our Applications, Websites, and Products are not intended for children under the age of 18. This includes any links to other websites that we provide for our convenience. We do not knowingly collect the information of children for any reason.

International Jurisdictions

Our Applications, Websites, and Products are hosted and offered in the United States of America (US), and are subject to US federal, state, and local law. If you are accessing the Applications, Websites, or Products from another country, please be advised that you may be transferring your information to us in the US, and you consent to that transfer and use of your information in accordance with this Policy. You also agree to abide by the applicable laws of applicable US federal, state, and local laws concerning your use of the Applications, Websites, and Products, and your agreements with us. Any persons accessing our Applications, Websites, or Products from any jurisdiction with laws or regulations governing the use of

the Internet, including the collection, use, or disclosure of information, different from those of the jurisdictions mentioned above may only use the Applications, Websites, or Products in a manner lawful in their jurisdiction. If your use of the Applications, Websites, or Products would be unlawful in your jurisdiction, you may not use the Applications, Websites, or Products.

[Accessibility](#)

We are committed to making our content accessible and user friendly to everyone. To request a copy of this Privacy Policy in an alternative format, please contact us at the information provided below.

You may print a copy here [INSERT LINK TO PDF].

[Changes To Our Privacy Policy](#)

We may change this Policy from time to time. Any and all changes will be reflected on this page, and where appropriate provided in person or by another electronic method. The effective date will be stated at the top of this Policy. You should regularly check this page for any changes to this Privacy Notice.

YOUR CONTINUED USE, ACCESS, OR INTERACTION WITH THE APPLICATIONS, WEBSITES, OR PRODUCTS, OR YOUR CONTINUED COMMUNICATIONS WITH US AFTER THE UPDATED POLICY HAS BEEN POSTED WILL REPRESENT THAT YOU HAVE READ AND UNDERSTOOD THIS POLICY.

[Contact Us](#)

dataprivacy@pangogroup.com or call us at 1-323-364-5541.