

# PRIVACY POLICY

**Effective Date:** January 1 2024

## DISCLAIMER FOR CALIFORNIA USERS.

Your privacy and rights under the California Consumer Privacy Act (CCPA) and the California Online Privacy Protection Act (CalOPPA) are important to us. We offer this document as a resource to view how we collect, manage, store, and use your Personal Information in the day-to-day running of our website. This Privacy Policy, intended for California residents, can be applied to all website users to disclose how we collect, manage, store, and use your Personal Information as defined under CIV 1798.140(v) of the California Consumer Privacy Act (CCPA).

## THE BUSINESS.

This Privacy Policy is between you and the following organization:

Company Name: 4Corners

Address: 7525 W 10th Avenue, Lakewood, Colorado, 80214

Phone: 303-847-0894

E-Mail: Hello@4Corners.com

## Website.

Website URL: www.4Corners.com

Website Name: 4Corners

## PERSONAL INFORMATION COLLECTED.

**Identifiers.** A real name or alias, postal address, signature, home phone number or mobile phone number, bank account number, credit card number, debit card number or other financial information, physical characteristics or description, e-mail address; account name, Social Security Number (SSN), driver's license number or state identification card number, passport number, or other similar identifiers.

**Commercial Information.** Records of personal property, products or services purchased, obtained, considered, or other purchasing or consuming histories or tendencies.

**Inferences Drawn From Other Personal Information.** Profile reflecting a person's preference, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

**Internet or Other Similar Network Activity.** Browsing history, search history, and information on a consumer's interaction with a website, application, or advertisement.

**Geolocation Data.** Physical location or movements. For example, city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation; and, with permission in on your

mobile device settings, and precise geolocation information from GPS-based functionality on your mobile devices.

**Professional or Employment Related Information.** Current or past job history, performance evaluations, disciplinary records, workplace injury records, disability accommodations, and complaint records.

**Emergency Contact Information.** Such as the name, phone number, address, and e-mail address of another person in the context of having an emergency contact on file, Personal information necessary for us to collect and retain to administer benefits for you and another person relating to you (e.g., your spouse, domestic partner, and dependents), such as their name, Social Security Number, date of birth, telephone number, e-mail, and address.

**Non-Public Education Information (per the Family Educational Rights and Privacy Act (20 U.S.C Section 1232g, 34 C.F.R. Part 99)).** Educational 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.

Hereinafter known as “Personal Information.”

## **SOURCES OF INFORMATION WE COLLECT.**

**Using the website.** We collect certain information from your activity on our website, starting when you first arrive and accessing it on an electronic device. We may collect your IP address, device ID, advertising identifiers, browser type, operating system, internet service provider, pages visited (including clicks and duration), and other related log information. For mobile phones, we may collect your device’s GPS signal or other information about nearby Wi-Fi access points and cell towers.

**Creating a User Profile or Account.** We may collect information directly from you or an agent authorized to act on your behalf. For example, if you, or someone acting on your behalf, provides your name and e-mail to create a profile or an account. We also collect information indirectly from you or your authorized agent. This can be done through information we collect from you while providing content, products, or services.

## **COOKIES POLICY.**

Currently, our website uses cookies to provide you with the best experience possible. We, in addition to our service providers, affiliates, agents, advertisers, or other parties in connection with the website, may deploy cookies, web beacons, local shared objects, and other tracking technologies for various purposes. Such shall be for business use, marketing purposes, fraud prevention, and to assist in the day-to-day operations of the website.

a.) **“Cookies” Defined.** Cookies act as data that is communicated between a user’s web browser and a website or application. They are stored on your device to help track their areas of interest, provide the best experience possible, and customize the content, products, services, offerings, and advertisements served on the website. Most web browsers adjust to your browser’s settings to decline or delete cookies, but doing so may degrade the experience with our online services.

b.) **1-Pixel Images.** Clear GIFs, pixel tags, or web beacons, which are generally 1-pixel, are transparent images located on a webpage or in an e-mail or other trackable source and may be used on our website in addition to any other communication offered by us. They are often used in connection with advertisements served to you that are interacted with, whether on our website or another online service and shared with us. This type of tracking is specifically meant to recognize users, assess traffic patterns, and measure site or campaign engagement.

c.) **Flash Cookies.** Local Shared Objects, sometimes known as “flash cookies,” may be stored on your device using a media player or other software. Flash cookies are similar to cookies in terms of their operation but may be managed in your browser in the same manner.

d.) **First (1<sup>st</sup>) Party & Third (3<sup>rd</sup>) Cookies.** First (1<sup>st</sup>) party cookies are stored by a domain (website) you are visiting directly. They allow us to collect analytics data, remember preferred settings (e.g., language, currency, etc.), and perform related functions. Third (3<sup>rd</sup>) party cookies are created by domains other than those you are visiting directly, hence its name “third (3<sup>rd</sup>) party.” They may be used for cross-tracking, retargeting, and ad-serving.

e.) **Essential Cookies.** Such cookies are technically necessary to provide website functionality. They act as a basic form of memory, used to store the preferences selected by a user on a given website or application. They are essential to browsing functionality and cannot be disabled by users. As an example, an essential cookie may be used to recognize a past user from having to log in each time they visit a new page in the same session.

f.) **Performance and Function Cookies.** Such cookies are used to enhance the performance and functionality of a website but are not essential to its use. However, without these cookies, certain functions (like videos) may become unavailable.

g.) **Advertising Cookies.** Such cookies are used to customize a user's ad experience on a website. When using data collected from cookies, it can prevent the same ad from appearing multiple times in the same session or that does not offer a pleasant experience. Advertising cookies may be used to serve a user with related services, products, or offerings that they may have shown a level of related interest in their past user history.

If you would like to know more about cookies and how they are used, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

## **ADVERTISEMENTS.**

Our website does not show advertisements to users. This includes affiliate ads or any products and services offered by 3rd parties.

## **HOW WE USE PERSONAL INFORMATION.**

We may use or disclose your Personal Information for the following purpose:

-**Offerings.** To provide products, services, and offerings that serve the best-matched advertisements.

- Alerts.** To provide e-mail alerts and other communications regarding our products, services, and offerings that may be of interest or that you registered to receive.
- Feedback.** To get feedback on website improvements and generally provide an overall better experience.
- Testing.** For testing, research, and analysis, of user behavior on the website.
- Protection.** To protect against fraud, safeguard data, and the general security of the website.
- Security.** To detect security incidents, verify human users, and avoid being subject to malicious, deceptive, fraudulent, or illegal activity.
- Law Enforcement.** To respond to law enforcement requests as required by applicable law, court order, or governmental regulations.
- Intended Purpose.** As described for the intended purpose when collecting your personal information.
- Assessment.** To evaluate or conduct a merger, divestiture, restricting, reorganizing, dissolution, or outright sale, either wholly or partially, of our assets in which your Personal Information becomes a part of such sale.

Our usage of your Personal Information may change over time, and when such changes occur, we will update this Privacy Policy accordingly.

## **SELLING PERSONAL INFORMATION.**

Our policy is that we **DO NOT** sell your personal information. If this should change, you will be notified and this Privacy Policy will be updated.

## **SHARING PERSONAL INFORMATION.**

We disclose your Personal Information to 3<sup>rd</sup> parties for business purposes. The general categories of 3<sup>rd</sup> parties that we share with are as follows:

- Our 3<sup>rd</sup> party service providers that, without their services, our website would not be able to function in its current manner;
- Affiliated websites and businesses in an effort to bring you and our users improved services, products, and offerings;
- Other companies, affiliate partners, and 3<sup>rd</sup> parties that help us advertise products, services, and offerings to you, other users, and potential new customers;
- Third (3<sup>rd</sup>) parties to whom you, or an authorized agent on your behalf, authorized us to disclose your Personal Information;
- Third (3<sup>rd</sup>) parties or affiliates in connection with a corporate transaction, such as a sale, consolidation, or merger of our financial institution or affiliated business; and
- Other third (3<sup>rd</sup>) parties to comply with legal requirements or to disclose Personal Information to government authorities per the rule of law.

In the last 12 months, it is recognized that we have disclosed the aforementioned categories of Personal Information for business purposes.

## **RIGHT AND CHOICES.**

This Section describes your rights and choices regarding how we collect, share, use, and protect your Personal Information, how to exercise those rights, and limits and exceptions to your rights and choices.

a.) **Exceptions.** The rights and choices in this Section do not apply to you if the information being collected is:

- Aggregate consumer information;
- Deidentified Personal Information; and
- Publicly available information.

b.) **Access to Information.** If the above exceptions do not apply, and you have not made this request more than twice in a 12-month period, you have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months from the date we receive your request. Once we receive and confirm your request on your behalf, we will disclose it to you or your representative:

- The categories of Personal Information we collect;
- The categories of sources for the Personal Information we collect;
- Our business or commercial purpose for collecting or selling such Personal Information;
- The categories of third parties to whom we sold or disclosed the category of Personal Information for a business or commercial purpose;
- The business or commercial purpose for which we sold or disclosed the category of Personal Information; and
- The specific pieces of Personal Information we collected about you in a form that you can take with you (also called a “Data Portability Request”).

c.) **Deletion (Erasure) Request Rights.** You have the right to request that we delete any of your Personal Information that we collect from you and retain, subject to certain exceptions. Once we receive and verify your request, we will delete and direct our service providers to delete your Personal Information from our records unless an exception applies. We may deny your deletion request if retaining the Personal Information is necessary for us or our service providers to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those for such activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, or exercise another right provided by law;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws when the businesses' deletion of the Personal Information is likely to render impossible or seriously impair the achievement of such research if you previously provided informed consent.
- Enable solely internal and lawful uses of such Personal Information that are compatible with the context in which you provided it.

d.) **Exercising Access, Data Portability, and Deletion Rights.** To exercise the access, data portability, deletion rights, or any other rights mentioned herein, a consumer or a consumer's authorized agent may submit a verifiable request to us by using the contact details mentioned herein.

e.) **Requests.** You may only make a verifiable consumer request for access or data portability in relation to this Section. We cannot respond to your request or provide you with Personal Information if

we cannot verify your identity or authority to make the request and confirm the Personal Information is related to you.

Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided via a verifiable consumer request to verify the requestor's identity or authority to make the request.

f.) **Authorized Agent.** An authorized agent is any person or legal entity registered with the Secretary of State or similar office that you have authorized to act on your behalf. If a request is made by an authorized agent acting on your behalf, we may require the following:

- Submission of evidence by you with your permission for the authorized agent to submit a verifiable request on your behalf;
- For you to directly acknowledge, via electronic communication, that the authorized agent is allowed to act on your behalf;
- Require the authorized agent to verify their identity; or
- For a power of attorney document to be submitted that is signed in accordance with state law.

We reserve the right to deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf and cannot verify their own identity to us.

g.) **Response Timing and Format.** As required under privacy laws, we agree to respond to any verifiable consumer request within 45 days of its receipt. If we require more time, with a maximum of 90 days, we will inform you, in writing, of the reason. Such notification will be by e-mail unless there is another preferred communication method provided.

If applicable, the response we provide will also explain the reasons we cannot comply with a request. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the Personal Information from one entity to another entity without hindrance.

No fee will be charged to process or respond to your verifiable consumer request.

h.) **Right of Non-Discrimination.** We do not discriminate against you for exercising any of your rights in this Privacy Policy and under applicable laws. Unless permitted by law, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods, services, and offerings, including through granting discounts or other benefits, imposing penalties; or
- Provide you with a different level of quality of goods or services.

## **CHANGES AND AMENDMENTS.**

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we make changes to this Privacy Policy, we agree to notify you by e-mail or other preferred communication methods.

## **LINKING TO 3<sup>RD</sup> PARTIES.**

We may provide links to 3<sup>rd</sup> party sources such as websites, applications, content, or software (“3<sup>rd</sup> Parties”). When you use a link online to visit 3<sup>rd</sup> Parties, you will be subject to their privacy policy and the jurisdiction of governing law. It is recommended to familiarize yourself with its terms and disclosures regarding your Personal Information. We are not responsible for the handling of your Personal Information when using, accessing, or visiting 3<sup>rd</sup> Parties.

## **SECURITY & PROTECTION.**

We use reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to Personal Information. This includes device safeguards used in accordance with industry standards.

It is understood by you that the Personal Information you submit to us electronically may not be secure when it is transmitted to us. Specifically, we recommend that you do not use unsecured or public channels to communicate sensitive or confidential information.

## **CONTACT.**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Information, your choices, or your rights regarding such use, or wish to exercise your rights, please do not hesitate to contact us by using the details mentioned in this Privacy Policy.