

PRIVACY POLICY - AEG/ASEC JV FACILITIES

Privacy Policy Revised Date: 9/25/2025

INTRODUCTION

We take your privacy seriously and we know you do too. This Privacy Policy (“**Policy**”) describes how we collect, process, and share Personal Data, your rights and choices, and other important information about how we handle your Personal Data.

WHO WE ARE

Anschutz Entertainment Group, Inc., by and through its affiliates and subsidiaries, including, Anschutz L.A. Venture, Inc. (collectively “AEG”), and American Skating Entertainment Centers, LLC (“ASEC” and together with AEG, “**we**”, “**us**”, “**our**”, or the “**JV Companies**”) jointly own and/or operate certain facilities (“**Facilities**”). These Facilities may be operated and/or managed by, and/or services provided through, ASEC or joint venture entities comprised of AEG and ASEC (each an “**Operator**” and collectively, the “**Operators**”), including:

- JV Ice Pickwick LLC - LA Kings Ice Burbank
- JV Ice Paramount, LLC - LA Kings Iceland Paramount
- JV Ice PV LLC - LA Kings Ice Palos Verdes
- JV Ice at the Cube LLC - The Cube Ice and Entertainment Center
- JV Ice Reseda, LLC - LA Kings Ice Reseda

When you interact with, or use the Services (defined below) of, the Operator, as well as AEG and ASEC, the Operator may collect and process Personal Data. Each of AEG, ASEC, and the Operators are controllers of this Personal Data. The privacy policies of AEG ([here](#)) and ASEC will apply to the processing by AEG and/or ASEC through Services provided through the Operator.

SCOPE OF THIS POLICY

This Policy applies to your use of the Operators’ “**Services**,” which include the following:

Our “**Offline Services**”

- When you visit a Facility; and
- When you interact with us in-person at a Facility, e.g. when you register for a program in person or over the phone.

Our “**Digital Services**”

- Our products, services, or technology in any Facility; and
- Our websites, mobile applications, social media pages, and other online services operated by or on behalf of the Facilities.

KEY POINTS

- When you visit the Facilities and/or use the Services, your information may be disclosed and processed by the Operator as well as ASEC and AEG. For more information on how AEG processes your Personal Data, view the [AEG Privacy Policy](#), and for information on how ASEC processes your Personal Data, view the ASEC privacy policy.
- How we process your Personal Data varies depending on the context in which you interact with us. We generally process Personal Data as necessary to provide the Services or features you request, and we process Personal Data for various business purposes (e.g. to improve our products and services and personalize your experience across your interactions with us). [Learn More](#).
- In some cases, the Operators and/or the JV Companies may use Personal Data collected by the Operators for their Commercial Purposes (as defined below), such as marketing and advertising. As part of these activities, the Operators and/or JV Companies may receive information from third parties, disclose information to third party partners and vendors, and may engage in “sales” or “sharing” of your Personal Data (as defined under applicable law). [Learn More](#) and [Learn How to Opt-Out](#).
- You have rights and choices with respect to how we collect and use your Personal Data. Learn more about your [Rights & Choices](#).
- Additional information about how we handle Personal Data in specific regions can be found here: [California/US States](#).
- This policy does not apply if you are an applicant, employee or independent contractor of the JV Companies or Facilities.

HOW TO CONTACT US

General Inquiries and Data Updates: privacy@asecenters.com

Opt-Out of Data Sales or Sharing; Data Rights Requests: Email privacy@asecenters.com or call (602) 834-3396.

Physical Address: American Skating Entertainment Centers, LLC
Attn: Privacy
1820 E. Ray Rd.
Chandler, AZ 85225, U.S.A.

CATEGORIES AND SOURCES OF PERSONAL DATA

The following describes how we categorize the types of data relating to identified or identifiable individuals and households (“**Personal Data**”) that we collect, and where we obtain it.

Categories of Personal Data We Process

The categories of Personal Data we process may include:

Audio/Visual Data-Recordings and images collected from surveillance cameras, as well as audio files and records, such as voicemails, call recordings, and the like.

Contact Data-Identity Data we can use to contact you, such as email and physical addresses, phone numbers, social media or communications platform usernames/handles.

Device / Network Data-Browsing history, search history, and information regarding your interaction with a website, application, or advertisement (e.g. IP Address, MAC Address, SSIDs, application ID/AdID/IDFA, session navigation history and similar browsing metadata, and other data generated through applications and browsers, including cookies and similar technologies or other device identifiers or persistent identifiers), online user ID, device characteristics (such as browser/OS version), web server logs, application logs, first party cookies, third party cookies, web beacons, clear gifs and pixel tags.

Identity Data-Information such as your name; address; email address; telephone number; gender; date of birth, age and/or age range; account login details, e.g. username and password, avatar, or other account handles/usernames.

General Location Data- Non-precise location data, e.g. location information derived from social media tags/posts, or general areas of our Facilities you visited.

Preference Data-Personal Data generated reflecting your preferences, characteristics, predispositions, behavior, demographics, household characteristics, market segments, likes, favorites and other data or analytics.

Sensitive Personal Data-Personal Data deemed “sensitive” under California or other laws. We collect the following categories of Sensitive Personal Data:

- **“Children’s Data”** Personal Data relating to individuals known to be under the age of 16, typically including Identity Data, Contact Data, and if provided, mailing address, phone number, child's birthdate, gender, age, school, and information about their sports-related extracurricular activities.
- **“Government ID Data”** Personal Data relating to official government identification, such as driver’s license or passport numbers, including similar Identity Data protected as Sensitive Data under applicable law.
- **“Health Data”** Personal Data related to your Health, e.g. information regarding health conditions or injuries.
- **“Payment Data”** Personal Data such as bank account details, payment card information, including similar data protected as Sensitive Data under applicable law, and relevant information in connection with a financial transaction.

Transaction Data-Information about the Services we provide to you, e.g. registrations, purchases, or other transactions you make with us or at our Facilities or through the Services.

User Content-Unstructured/free-form data that may include any category of Personal Data, e.g. data that you give us in free text fields such as comment boxes.

Sources of Personal Data We Process

We collect Personal Data from various sources, which include:

Data you provide us-We receive Personal Data when you provide it to us, when you complete a form or registration, complete a transaction with us, or when you otherwise use our Services.

Data we collect automatically-We collect Personal Data about or generated by any device used to access our Digital Services or when you use WiFi at any of our Facilities.

Service providers-We receive Personal Data from service providers performing services on our behalf.

Partners-We receive Personal Data from partners, such as partner-operated events and other events or functions that unaffiliated parties may operate at our Facilities or through our Services.

Aggregators and advertisers-In some cases, we receive Personal Data from ad networks, data brokers, Targeted Advertising vendors, market research, and social media companies or similar companies who provide us with additional Personal Data, e.g. Preference Data.

Social media companies-In some cases, we may receive Personal Data from Meta (e.g. Facebook and Instagram) and other social media companies if you use social media sign on, or interact with that social media company on or in connection with our Services.

Data we create or infer-We, certain partners, social media companies, and third parties operating on our behalf, create and infer Personal Data such as Preference Data or Aggregate Data based on our observations or analysis of other Personal Data processed under this Policy, and we may correlate this data with other data we process about you.

DATA PROCESSING CONTEXTS / NOTICE AT COLLECTION

When you use our Services, we process your Personal Data in specific contexts and for certain specified purposes, as well as for our general business purposes and, in some cases, for Commercial Purposes (as defined below). See below for more information regarding Data Retention and Regional Data Rights.

Digital Services

Generally

We process Device/Network Data, Contact Data, Identity Data, General Location Data, and Preference Data when you use our Digital Services. You may also be able to complete registrations and purchases or enroll in Marketing Communications through our Digital Services (see below for more information).

We use this Personal Data as necessary to operate our Digital Services, such as keeping you logged in, delivering pages, etc., for our Business Purposes, and our other legitimate interests, such as

ensuring the security of our websites, mobile applications and other technology systems and analyzing the use of our Services, including navigation patterns, feature use, etc. to help understand and make improvements to the Services. We may process this Personal Data for our Commercial Purposes (which may include data sales/sharing).

Please note: Certain aspects of our Digital Services are delivered through third party service providers. You may create an account on third party platforms, and third party privacy policies may apply when you interact with portions of third party platforms controlled by that third party.

Cookies and other tracking technologies

We process Identity Data, Device/Network Data, Contact Data, Preference Data, and General Location Data, in connection with our use of cookies and similar technologies on our Digital Services. We may collect this data automatically.

We and authorized third parties may use cookies and similar technologies for the following purposes:

- for “essential” purposes necessary for our Digital Services to operate (such as maintaining user sessions, CDNs, and the like);
- for “functional” purposes, such as to enable certain features of our Digital Services (for example, to allow a customer to maintain an online shopping cart);
- for “analytics” purposes and to improve our Digital Services, such as to analyze the traffic to and on our Digital Services (for example, we can count how many people have looked at a specific page, or see how visitors move around the website when they use it, to distinguish unique visits/visitors to our Digital Services, and what website they visited prior to visiting our website, and use this information to understand user behaviors and improve the design and functionality of the website);
- for “retargeting,” Targeted Advertising, or other advertising and marketing purposes, including technologies that process Preference Data or other data so that we can deliver, buy, or target advertisements which are more likely to be of interest to you; and
- for “social media” e.g. via third-party social media cookies, or when you share information using a social media sharing button or “like” button on our Services or you link your account or engage with our content on or through a social networking website such as Facebook or X.

We may also process this Personal Data for our Business Purposes and Commercial Purposes (which may include data sales/sharing). See the Rights and Choices section for information regarding opt-out rights for cookies and similar technologies.

Third parties may view, edit, or set their own cookies or place web beacons on our websites.

We, or third-party providers, may be able to use these technologies to identify you across platforms, devices, sites, and services. Third parties may engage in Targeted Advertising using this data. Third parties have their own privacy policies and their processing is not subject to this Policy.

Video Feeds

We may offer live video feeds from our Facilities during certain events or activities, and we may enable the collection of Audio/Visual Data from cameras installed in-venue to offer these video feeds. We process this data only to enable the live video fees and for our related Business Purposes.

Please note: Livestream video feeds may be viewed using a third-party streaming service; the live feed streaming service is not part of our Digital Services and is not covered by this Policy. Please visit the Facility website for information regarding the events and activities that may be broadcast and visit the website for the third party streaming service for more information regarding how the third party provider processes your Personal Information.

Purchases and Donations

We process Identity Data, Transaction Data, Contact Data, Device/Network Data, Preference Data, and Payment Data when you complete a purchase or sale transaction (e.g. for lessons, free skate, or other programs), or make a charity donation through our Services. We and/or our service providers may store your Payment Data if you request, e.g. as part of a recurring payment or otherwise within your user account. If provided, we process Health Data, for example if you indicate a health condition or accommodation as part of an event or user registration.

We process this Personal Data as necessary to perform or initiate a transaction with you, process your order, payment, or refund, carry out fulfillment and delivery, document transactions, and for our Business Purposes.

We may process Identity Data, Transaction Data, Contact Data, Device/Network Data, and Preference Data for Commercial Purposes (which may include data sales/sharing). We do not sell or “share” Payment Data or Health Data or use it for Business Purposes not permitted under applicable law.

Third party businesses/controllers may process your information. Third Party data controllers/businesses provide many products and services you purchase through our Services. We may disclose Identity Data, Transaction Data, Contact Data, and Device/Network Data to those third parties. You may also direct us to disclose this data to or interact with these third parties as part of participating in a program, receiving premium upgrades, or making a purchase (which does not involve a data sale by the JV Companies).

Visiting the Facilities

We process Identity Data, Transaction Data, Payment Data, Preference Data, General Location Data, and Contact Data when you visit our Facilities, such as to participate in a program or attend an event. If provided or due to an incident at a Facility, we may also process Health Data. We may collect Audio/Visual Data in relation to the use of CCTV cameras, and you may also interact with our Digital Services at our Facilities.

We process Identity Data, Transaction Data, Payment Data, Preference Data, General Location Data Audio/Visual Data, and Contact Data as necessary to operate our Facilities and provide our services to you, for our Business Purposes, and our other legitimate interests, including:

- verifying your identity for authentication and security purposes;
- helping us to ensure our customers are genuine and to prevent fraud;
- to help us to return lost property to its rightful owner; and
- managing access to specific areas of our Facilities.

We process Health Data only as necessary to provide you with appropriate services (for example, a wheelchair accessible space, or in the event of a medical emergency) or to help us investigate an incident which may have taken place at our Facilities, and for certain Business Purposes.

We may use Identity Data, Transaction Data, Preference Data, and Contact Data collected in this context for our Commercial Purposes (which may include data sales/sharing). We do not sell or “share” Payment Data, Health Data, or Audio/Visual Data.

Camps, Clinics, and other Programs

We collect and use Personal Data – which may include Children’s Data – as necessary to complete registrations or other requests relating to clubs, youth camps, clinics, leagues, and other programs operated by or through the Facilities (“**Programs**”). We may also collect you or your child’s mailing address and phone number, as well as your child’s birthdate, gender, age, school, and information about their sports-related extracurricular activities.

We generally process this data as necessary to establish and maintain enrollment, and otherwise operate the Program. We may also process this data as necessary in connection with certain legitimate business interests, such as:

- communicating with you about the Program;
- to help us to return lost property to its rightful owner;
- to contact you in relation to your child; and
- managing access to events.

Children’s Data collected in connection with our Programs is not used for marketing or Commercial Purposes. We may process data of parents (e.g. Identity Data and Contact Data) for Commercial Purposes, for example, to send you Marketing Communications relating to our Programs. Our Digital Services are not directed at or intended for use by minors, and we do not generally collect Personal Data from minors directly. In the event we do so, we will process it with parental consent where required. See the “Children’s Data” section below for more details.

Marketing Communications

We process Device/Network Data, Contact Data, Identity Data, and Preference Data in connection with marketing emails, SMS, push notifications, telemarketing, or similar communications (“Marketing Communications”), and when you open or interact with those Marketing Communications. You may receive Marketing Communications if you consent and, in some jurisdictions, as a result of account registration or a purchase. Please note, we may send marketing communications about us, our Facilities and Services, and where permitted by law, we may send

Marketing Communications on behalf of third parties (such as event partners, partner brands and the like.)

We process this Personal Data to deliver and manage our Marketing Communications, as well as for our Business Purposes. We may use this data for our Commercial Purposes (which may include data sales/sharing). Marketing Communications may also be personalized as permitted by applicable law, but will not involve Targeted Advertising or the processing of Sensitive Data where users have opted out or not provided necessary consents. See the Rights and Choices section to learn limit or opt out of this processing.

Contests and Promotions

We may collect and process Identity Data, Preference Data, certain Contact Data, and User Content when you enter a contest/sweepstakes or take part in a promotion.

We process this Personal Data as necessary to provide the contest/promotion, notify you if you have won, or to process delivery of a prize, for our Business Purposes, and other legitimate interests, such as:

- verifying your identity for authentication, anti-fraud, and security purposes (in which case we may process Government ID Data to complete verification);
- to improve our Services and to create a personalized user experience; and
- to contact you about relevant products or services, and in connection with marketing communications and Targeted Advertising.

We may process Identity Data, Contact Data, and User Content information for our Commercial Purposes (which may include data sales/sharing).

Some programs and offers are operated/controlled by our third-party partners or their affiliates or partners. We may receive this data from third parties to the extent allowed by the applicable partner; otherwise, this Privacy Policy will not apply to data processed by third parties.

Your Personal Data may be public. If you win a contest/sweepstakes, we may publicly post some of your data. We do not post Personal Data without consent where required by law. See any program agreement(s) for additional details and terms.

Contact us; Support

We collect and process Identity Data, Contact Data, and User Content when you contact us, e.g. through a contact us form, or for support. If you call us via phone, we may collect Audio/Visual data from the call recording.

We process this Personal Data to respond to your request, and communicate with you, as appropriate, and for our Business Purposes. If you consent or if permitted by law, we may use Identity Data and Contact Data to send you marketing communications and for our Commercial Purposes (which may include data sales/sharing).

Vendors

We process Identity Data, Contact Data, Government ID Data, User Content, and in certain cases, Sensitive Data (e.g. Payment Data, Government ID Data or Health Data) in connection with your application or engagement as a vendor.

We process this Personal Data as necessary to evaluate, establish, and maintain the vendor relationship, and for our Business Purposes. We do not sell or share Personal Data processed in this context. We process Sensitive Personal Data only for Business Purposes permitted under applicable law.

Employees and contractors are subject to separate privacy notices. If you are an applicant, employee, independent contractor engaged by any JV Companies, former employee/independent contractor, or beneficiary, your Personal Data is subject to the HR privacy policies of your employer (if any).

Feedback and Surveys

We process Identity Data, Contact Data, Preference Data, and User Content collected in connection with guest surveys or questionnaires. We process this Personal Data as necessary to respond to guest requests/concerns, for our Business Purposes, and other legitimate interests, such as analyzing guest satisfaction allowing third-party partners to communicate with guests.

We may process this Personal Data for our Commercial Purposes (which may include data sales/sharing). We may share Feedback/Survey data relating to third party partners with those partners, who may use it for their own purposes.

PROCESSING PURPOSES

Business Purposes

We and our Service Providers process Personal Data we hold for numerous business purposes, depending on the context of collection, your rights and choices, and our legitimate interests. We generally process Personal Data for the following “Business Purposes.”

Service Delivery

We process Personal Data as necessary to provide our Services and the products and services you purchase or request. For example, we process Personal Data to authenticate users and their rights to access the Services, a Facility, event, or as otherwise necessary to fulfill our contractual obligations to you, provide you with the information, features, and services you request, and create relevant documentation.

Internal Processing and Service Improvement

We may use any Personal Data we process through our Services as necessary in connection with our legitimate interests in improving the design of our Service, understanding how our Services are used or function, for customer service purposes, for internal research, technical or feature development, to track service use, QA and debugging, audits, and similar purposes.

Security and Incident Detection

We may process Personal Data in connection with our legitimate interest in ensuring that our Services, and Facilities are secure, identify and prevent crime, prevent fraud, verify or authenticate users/individuals, and ensure the safety of our guests. Similarly, we process Personal Data on our Digital Services as necessary to detect security incidents, protect against, and respond to malicious, deceptive, fraudulent, or illegal activity. We may analyze network traffic, device patterns, and characteristics, maintain and analyze logs and process similar Personal Data in connection with our information security activities.

Personalization

We process certain Personal Data as necessary in connection with our legitimate interest in personalizing our Digital Services. For example, aspects of the Digital Services may change so they are more relevant to you. We may personalize based on Preference Data and your current interactions with the Service, or obtain it from third parties, using Personal Data we hold about you. We may also personalize based on Profiles, where permitted by law, e.g. by displaying your name and other appearance or display preferences, to display content that you have interacted with in the past, or to display content that we think may be of interest to you based on your interactions with our Digital Services and other content.

Aggregated Data

We process Personal Data in order to identify trends, including to create aggregated and anonymized data about buying and spending habits, use of our Services, and other similar information (“**Aggregated Data**”). Aggregated Data that does not contain Personal Data is not subject to this Privacy Policy.

Compliance, Health, Safety, Public Interest

We may also process Personal Data as necessary to comply with our legal obligations, such as where you exercise your rights under data protection law, for the establishment and defense of legal claims, where we must comply with requests from government or law enforcement officials, and as may be required to meet national security or law enforcement requirements or prevent illegal activity. We may also process data to protect the vital interests of individuals, or on certain public interest grounds, each to the extent required or permitted under applicable law. Please see the How We Share Personal Data section for more information about how we disclose Personal Data in extraordinary circumstances.

Commercial Purposes

We and certain third parties process Personal Data to further our commercial or economic interests (“**Commercial Purposes**,”) depending on the context of collection and your rights and choices.

Please Note – We may require your consent, or we may not engage in processing of Personal Data for Commercial Purposes in some jurisdictions. See the “Regional Supplements” section below for more information.

Profiles

In order to understand our customers' preferences, and better recommend products and services that are personalized to our customers, we may create a **"Profile"** by linking together and analyzing Personal Data collected via the Services.

We may augment Profiles with Personal Data that we receive from other third parties, e.g. information about Services you have used or purchased previously, Facilities you visited, events you have attended.

We use Profiles for our legitimate interests in market research and statistical analysis in connection with the improvement of our Services. For example, we may analyze the Personal Data of customers who attended a program or event and then compare them with other customers in our database. If we identify other customers in our database who have similar Personal Data to the original purchasers, we may direct marketing about that event to the similar customers. We may conduct the profiling and send the direct marketing emails automatically.

Profiles involve processing that is automated, in whole or in part.

Personalized Marketing Communications

We may personalize Marketing Communications based on your Profile. If consent to Consumer Profiling or Targeted Advertising is required by law, we will seek your consent.

Targeted Advertising

In some jurisdictions, we, and certain third parties operating on or through our Services, may engage in advertising targeted to your interests based on Personal Data that we or those third parties obtain or infer from your activities across non-affiliated websites, applications, or services in order to predict your preferences or interests (**"Targeted Advertising"**). This form of advertising includes various parties and service providers, including third party data controllers, engaged in the processing of Personal Data in connection with advertising. These parties may be able to identify you across sites, devices, and over time.

The parties that control the processing of Personal Data for Targeted Advertising purposes may create or leverage information derived from personalization, profiles, and marketing communications. In some cases, these parties may also develop and assess aspects of a Profile about you to determine whether you are a type of person a company wants to advertise to, and determine whether and how ads you see are effective. These third parties may augment your profile with demographic and other Preference Data, and may track whether you view, interact with, or how often you have seen an ad, or whether you purchased advertised goods or services.

We generally use Targeted Advertising for the purpose of marketing our Services and third-party goods and services, and to send marketing communications, including by creating custom marketing audiences on third-party websites or social media platforms.

Data Sales

We may engage in "sales" of data as defined by applicable law. For example, we may "sell" certain Personal Data when we engage in marketing campaigns with or on behalf of partners, conduct

Targeted Advertising, or we may sell or grant access to Personal Data to our marketing partners, artists, promoters, and other advertisers in relation to Targeted Advertising, joint promotions, and other marketing initiatives. See the California Rights & Disclosures section for a list of categories of Personal Data sold or shared.

DISCLOSURE/SHARING OF PERSONAL DATA

We may share Personal Data with the following categories of third-party recipients and/or for the following reasons:

JV Companies / AEG - we will share your Personal Data with other JV Companies and/or AEG in order to streamline certain business operations, and in support of our Business Purposes, and Commercial Purposes.

Service Providers- We may share your Personal Data with service providers who provide certain services or process data on our behalf in connection with our general business operations, product/service fulfillment and improvements, to enable certain features, and in connection with our (or our Service Providers') Business Purposes.

Partners, Advertisers, and Social Media Platforms- We may share certain Personal Data with social media platforms, advertisers, ad exchanges, data management platforms, or brand or event partners in support of our Business Purposes and Commercial Purposes. We may allow these third parties to operate through our Services.

Public Disclosure - If you use any social media plugin, API, or other similar feature, use an event hashtag or similar link, or otherwise interact with us or our Services via social media, we may make your post available on our Services or to the general public. We may share, rebroadcast, or redisplay Personal Data or other information in the post to the extent permitted by the relevant social media service.

Data Aggregators- We may share Personal Data with data aggregators in support of our Commercial Purposes and in connection with Targeted Advertising. These disclosures/sales can help better personalize our Services, the services of third parties, enrich Profiles, and help ensure that you see advertisements that are more relevant to your interests.

Successors-We may share Personal Data if we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, Personal Data may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction.

Lawful Recipients-In limited circumstances, we may, without notice or your consent, access and disclose your Personal Data, any communications sent or received by you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, to investigate violations of our Terms of Use, in the vital interests of us or any person (such as where we reasonably believe the use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual or to public health or safety) or in such other circumstances as may be required or permitted by law. These disclosures may be made to governments that do not ensure the same degree of protection of your Personal Data as your home jurisdiction. We may, in our sole discretion (but without any obligation), object to the disclosure of your Personal Data to such parties.

INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

If you are located outside the US, we may transfer or process your Personal Data in the US, and other jurisdictions where any of our service providers operate. Where required by local law, we ensure your data remains protected in connection with any international transfers. See the “REGIONAL SUPPLEMENTS” section below for more information.

YOUR RIGHTS & CHOICES

You may have certain rights and choices regarding the Personal Data we process. Please note, these rights may vary based on the country or state where you reside, and our obligations under applicable law. See the “US States/California” section for more information regarding your rights and choices in your jurisdiction.

Your Rights

You may have certain rights and choices regarding the Personal Data we process. See the “US States/California” section below for rights available to you in your jurisdiction. To submit a request, contact us as described above. We verify your identity in connection with most requests, as described below.

Verification of Rights Requests

If you submit a request, we typically must verify your identity to ensure that you have the right to make that request, reduce fraud, and to ensure the security of Personal Data. If an agent is submitting the request on your behalf, we reserve the right to validate the agent's authority to act on your behalf.

We may require that you match Personal Data we have on file in order to adequately verify your identity. If you have an account, we may require that you log into the account to submit the request as part of the verification process. We may not grant access to certain Personal Data to you if prohibited by law.

Your Choices

Marketing Communications

You can withdraw your consent to receive marketing communications by clicking on the unsubscribe link in an email (for email), by responding with "OPT-OUT," STOP, or other supported unsubscribe message (for SMS), by adjusting the push message settings for our mobile apps using your device operating system (for push notifications), or for other communications, by contacting us using the information below. To opt-out of the collection of information relating to email opens, configure your email so that it does not load images in our emails.

Withdrawing Your Consent/Opt-Out

You may withdraw any consent you have provided at any time. The consequence of you withdrawing consent might be that we cannot perform certain services for you, such as location-based services, personalizing or making relevant certain types of advertising, or other services conditioned on your consent or choice not to opt-out.

Cookies, Similar Technologies, and Targeted Advertising

General- If you do not want information collected through the use of cookies, you can manage/deny cookies (and certain technologies) using your browser's settings menu or our Manage Cookies page. You may need to opt out of third-party services directly via the third party. For example, to opt-out of Google's analytic and marketing services, visit [Google Analytics Terms of Use](#), the [Google Policy](#), or [Google Analytics Opt-out](#).

Targeted Advertising- You may opt out or withdraw your consent to Targeted Advertising by visiting the cookie management link on relevant webpages with Targeted Advertising. In some cases, you may be able to opt-out by submitting requests to third party partners, including for the vendors listed below:

- [Google Ads](#)
- [Meta Pixel](#)
- [Digital Advertising Alliance's opt-out](#)

Global Privacy Control (GPC)- Our Digital Services may support certain automated opt-out controls, such as the [Global Privacy Control](#) (“GPC”). GPC is a specification designed to allow Internet users to notify businesses of their privacy preferences, such as opting-out of the sale/sharing of Personal Data. To activate GPC, users must enable a setting or use an extension in the user’s browser or mobile device. Please review your browser or device settings for more information regarding how to enable GPC.

Please note: We may not be able to link GPC requests to your Personal Data in our systems, and as a result, some sales/sharing of your Personal Data may occur even if GPC is active. See the “REGIONAL SUPPLEMENTS” section below for more information regarding other opt-out rights.

Do-Not-Track - Our Services do not respond to your browser’s do-not-track request.

DATA SECURITY

We implement and maintain commercially reasonable security measures to secure your Personal Data from unauthorized processing. While we endeavor to protect our Services and your Personal Data from unauthorized access, use, modification and disclosure, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others.

CHILDREN’S DATA

If you have questions regarding the processing of Children’s Data, please contact us.

DATA RETENTION

We retain Personal Data for so long as it is reasonably necessary to achieve the relevant processing purposes described in this Privacy Policy, or for so long as is required by law. What is necessary may vary depending on the context and purpose of processing. We generally consider the following factors when we determine how long to retain data (without limitation):

- Retention periods established under applicable law;
- Industry best practices;
- Whether the purpose of processing is reasonably likely to justify further processing;
- Risks to individual privacy in continued processing;
- Applicable data protection impact assessments;
- IT systems design considerations/limitations; and
- The costs associated continued processing, retention, and deletion.

We will review retention periods periodically and may pseudonymize or anonymize data held for longer periods.

THIRD PARTY WEBSITES AND MOBILE APPLICATIONS

Except for processing by our service providers (described above), this Privacy Policy does not apply to third party websites, products, or services. For example, we handle some of the purchase process on our Services directly, and third-party businesses (such as payment processors) may manage others. Third parties may operate or develop some JV Companies' websites and mobile apps, or may operate or host a contest/sweepstakes on our Services. In these cases, the terms, conditions, and privacy practices of the third party, not those of the JV Companies, may govern your transactions, and we may have no control over the Personal Data collected.

CHANGES TO OUR POLICY

We may change this Policy from time to time. We will post changes on our Services. We will notify you of any material changes, if required, via email or notices on our Digital Services. Your continued use of our Services constitutes your acknowledgement of any revised Policy.

REGIONAL SUPPLEMENTS

US States/California

US State & California Privacy Rights & Choices

Under the California Consumer Privacy Act (“**CCPA**”) and other state privacy laws, residents of certain US states may have the following rights, subject to regional requirements, exceptions, and limitations.

Confirm- Right to confirm whether we process your Personal Data.

Access/Know- Right to request any of following: (1) the categories of Personal Data we have collected, sold/shared, or disclosed for a Commercial Purpose; (2) the categories of sources from which your Personal Data was collected; (3) the purposes for which we collected or sold/shared your Personal Data; (4) the categories of third parties to whom we have sold/shared your Personal Data, or disclosed it for a business purpose; and (5) the specific pieces of Personal Data we have collected about you.

Portability- Right to request that we provide certain Personal Data in a common, portable format.

Deletion- Right to delete certain Personal Data that we hold about you.

Correction- Right to correct certain Personal Data that we hold about you.

Opt-Out (Sales, Sharing, Targeted Advertising, Profiling)- Right to opt-out of the following:

- If we engage in sales of data (as defined by applicable law), you may direct us to stop selling Personal Data.
- If we engage in Targeted Advertising (aka “sharing” of Personal Data or cross-context behavioral advertising,) you may opt-out of such processing.

- If we engage in certain forms of “profiling” (e.g. profiling that has legal or similarly significant effects), you may opt-out of such processing.

Opt-out or Limit Use and Disclosure of Sensitive Personal Data- right to opt-out of the processing of certain Sensitive Data, or request that we limit certain uses of Sensitive Personal Data. This right does not apply in cases where we only use Sensitive Personal Data where necessary, or for certain business purposes authorized by applicable law.

Opt-in/Opt-out of Sale/Sharing of Personal Data- To the extent we have actual knowledge that we collect or maintain Personal Data of a minor under age 16 in California, those minors must opt in to any sales/sharing of Personal Data (as defined under CCPA), and minors under the age of 13 must have a parent consent to sales/sharing of Personal Data. All minors have the right to opt-out later at any time.

Non-Discrimination- California residents have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the CCPA.

List of Direct Marketers- California residents may request a list of Personal Data we have disclosed about you to third parties for direct marketing purposes during the preceding calendar year.

Remove Minors’ User Content- Residents of California under the age of 18 can delete or remove posts using the same deletion or removal procedures described above, or otherwise made available through the Services. If you have questions about how to remove your posts or if you would like additional assistance with deletion, contact us using the information below. We will work to delete your information, but we cannot guarantee comprehensive removal of that content or information posted through the Services.

Submission of Requests

You may submit requests as follows (please our review verification requirements section). If you have any questions or wish to appeal any refusal to take action in response to a rights request, contact us at privacy@asecenters.com. We will respond to any request to appeal within the period required by law.

<p>Access/Know, Confirm Processing, Portability, Deletion, and Correction</p> <p>Opt-out/Limit Use and Disclosure of Sensitive Personal Data</p> <p>Opt-in/Opt-out of Sale/Sharing of Personal Data</p>	<ul style="list-style-type: none"> • Contact us at privacy@asecenters.com • You may call us at: (602) 834-3396. You will be directed to leave a voicemail where you will provide your email address, phone number and address we have on file, along with your request. • You may send mail to our physical address (noted above) with your email address, phone number and address we have on file, along with your request.
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<p>Opt-Out of Sales, Sharing, Targeted Advertising or Profiling</p>	<ul style="list-style-type: none"> • Contact us at privacy@asecenters.com • You may call us at: (602) 834-3396. You will be directed to leave a voicemail where you will provide your email address, phone number or address, along with your request. • You may opt out or withdraw your consent to Targeted Advertising by reviewing the Rights and Choices section above. In some cases, you may be able to opt-out by submitting requests to third party partners, including for the vendors listed below: <ul style="list-style-type: none"> • Google Ads • Doubleclick • Meta Pixel • Digital Advertising Alliance’s opt-out • Network Advertising Initiative opt-out <p>Global Privacy Control (GPC)- Our Digital Services may support certain automated opt-out controls, such as the Global Privacy Control (“GPC”). GPC is a specification designed to allow Internet users to notify businesses of their privacy preferences, such as opting-out of the sale/sharing of Personal Data. To activate GPC, users must enable a setting or use an extension in the user’s browser or mobile device. Please review your browser or device settings for more information regarding how to enable GPC.</p> <p>Please note: We may not be able to link GPC requests to your Personal Data in our systems, and as a result, some sales/sharing of your Personal Data may occur even if GPC is active. See the “REGIONAL SUPPLEMENTS” section below for more information regarding other opt-out rights.</p> <p>Do-Not-Track - Our Services do not respond to your browser’s do-not-track request.</p> <ul style="list-style-type: none"> • to opt out of Targeted Advertising/sharing. Digital Services supporting GPC (or similar standards) will treat the request as a request to opt-out of Targeted Advertising/sharing on the device where the GPC setting is active.
<p>List of Direct Marketers; Remove Minors’ User Content</p>	<ul style="list-style-type: none"> • Contact us via email to our privacy team at privacy@asecenters.com

Categories of Personal Data Disclosed for Business Purposes

For purposes of the CCPA, we have disclosed to Service Providers for “business purposes” in the preceding 12 months the following categories of Personal Data, to the following categories of recipients:

Category of Personal Data	Category of Recipients
Audio/Visual Data	JV Companies;; Service Providers; Public Disclosure; Successors; Lawful Recipients
Biographical Data	
Transaction Data	
Contact Data	
Device/Network Data	
Identity Data	
Preference Data	
General Location Data	
User Content	
Government ID Data; Health Data; Payment Data; Children’s Data	JV Companies; Service Providers; Successors; Lawful Recipients

Categories of Personal Data Sold, Shared, or Disclosed for Commercial Purposes

For purposes of the CCPA, we have “sold” or “shared” in the preceding 12 months the following categories of Personal Data in the, to the following categories of recipients:

Category of Personal Data	Category of Recipients
Transaction Data	Partners, Advertisers, and Social Media Platforms; Data Aggregators
Contact Data	
Device/Network Data	
Identity Data	
Preference Data	
General Location Data	
User Content	

Categories of Sensitive Personal Data Used or Disclosed

For purposes of CCPA, we may use or disclose the following categories of Sensitive Personal Data: Children's Data; Government ID Data; Health Data; Payment Data. However, we do not sell or share Sensitive Personal Data, or use it for purposes other than those listed in CCPA section 7027(m).