



Wingspan Group, Inc. Privacy Notice

Effective Date: December 1, 2023

Wingspan Group, Inc. (“**Wingspan**”) understands the importance of your privacy. This Privacy Notice applies when you visit our website at wingspanscouting.com (the “**website**”), interact with us, or use any and all of our products and services (collectively, our “**services**”). Our Privacy Notice describes our collection of information during your interactions with our services, and the rights and choices you have regarding your information.

By using our services, you agree with the terms of this Privacy Notice, the Subscription Terms and Conditions and our Terms of Use.

Information Collection

Wingspan collects data, including personal information about you. “**Personal information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

In the previous twelve months, we have collected various types of information, including:

<u>Data Category</u>	<u>Examples of Specific Data</u>	<u>When the Data is Collected</u>
Browsing Information	<ul style="list-style-type: none">• IP address• Browser type• Browser settings• Device ID• Operating system• Cookie ID	We collect browsing information automatically when you visit our website or app.
Commercial Information	<ul style="list-style-type: none">• Business address• Business phone number• Business email	We collect commercial information when you become our vendor, or if you voluntarily provide it to us.
Contact Information	<ul style="list-style-type: none">• Name• Contact details• Home address• Personal email• Phone numbers• Previous residence address	We collect contact information when you provide it to us via your account, email, participate in sweepstakes, online form or application submission, or through other means.



Financial Information	<ul style="list-style-type: none">• Bank account information• Payment card information	We collect financial information when you sign up for our services or make any payments.
Social Media Data	<ul style="list-style-type: none">• Profile username• First name• Last name• Contact information• Profile picture• Post history	We may collect social media information when you voluntarily provide it to us.

We collect data and personal information from a variety of different sources, including:

- **Website visitors.** We collect browsing information automatically from those who visit our website. We collect contact information, commercial information, and social media data from those who provide it voluntarily via contact forms, job applications, email messages, and social media links.
- **Customers, vendors, and service providers.** We will collect commercial information, contact information, and financial information when you voluntarily become our customer, vendor, or service provider.
- **Cookies and trackers.** We use cookies and other embedded tracking technology like web beacons which automatically collect users' browsing information when they use our website. You will find other parties' trackers on our website. Other parties like our analytics and advertising partners place code with cookies or web beacons embedded in them. These are called third-party cookies. Some third-party cookies are used to track a particular user's activity across the Internet.

Sensitive Information. Wingspan does not collect, use, or processes certain personal information classified as sensitive information under U.S. state or foreign legislation.

Personal information retention. Wingspan uses several criteria to determine how long we should keep categories of personal information. We will retain your personal information for the time period reasonably necessary to achieve the business purposes outlined in this Privacy Notice to the extent permitted by applicable law.

Please understand that residual copies of the personal information can be stored in locations or formats that make complete erasure extremely difficult. The best way to ensure you control your information is to give us only the personal information that you are completely comfortable sharing with us.

How we use collected information. Wingspan uses data and personal information for a variety of business purposes, as described below. We use the information we obtain about you to:



- **Manage our business.** Wingspan uses data and personal information to maintain user accounts, facilitate usage of the services, and complete necessary tasks to manage our business and provide our services.
- **For employment purposes.** Wingspan uses data and personal information to process and review job applications.
- **Customer purchases.** Wingspan uses data and personal information to provide customers with information about products, services, or other requested material, and to process, validate, and deliver purchases.
- **Conduct research and improve our business.** Wingspan uses data and personal information to conduct marketing research, such as questionnaires and surveys, and to analyze and enhance our marketing communications and strategies.
- **Offers and Services.** Wingspan uses data and personal information to alert you to special offers, updated information, and other new products or services from Wingspan. Wingspan also uses personal information to manage your participation in our events and other promotions, where you have signed up for such events and promotions.
- **Communications.** Wingspan uses data and personal information to communicate important business information, including delivering notices to you about the use of our services.
- **Protect our business.** Wingspan uses data and personal information to protect against fraud, unauthorized transactions, and other liabilities, and secure our services. by identifying potential hackers and unauthorized users.
- **Other reasons.** We may use data and personal information for other purposes with your consent or where permitted by law, for example to comply with applicable legal requirements, court orders, legal proceedings, document requests, industry standards, and our internal policies.

Selling and Sharing. In the past twelve months, Clue Perfumery has not disclosed information obtained from consumers to certain third parties in exchange for monetary or other consideration or for purposes of cross-contextual advertising. However, our use of cookies and other website tracking technologies may be considered a sale or sharing of Personal Information under certain Data Protection Laws, in which case the categories of Personal Information that we have sold or shared include identifiers (e.g., IP addresses) and internet or other similar network activity. Categories of third parties to whom Personal Information is sold or shared include data analytics providers and advertising and marketing providers. For the avoidance of doubt, we have not sold Personal Information of children under the age of 16.

Other disclosures. We may disclose your data and personal information in the following ways and circumstances:

- **When you consent.** Out of respect for your privacy, Wingspan will not disclose your data and personal information to others without your consent, except as specified in this Privacy Notice.



- **With our service providers and vendors.** We transfer all or a portion of your data and personal information to our service providers who help us deliver our products and services to you and for the purposes described in this Privacy Notice. These service providers are required by contract or law to only use or disclose the information as necessary to perform services on our behalf or as otherwise required by law. Although Wingspan requires these third parties meet our privacy and security requirements, Wingspan does not control the privacy or security policies of such third parties.
- **With our affiliated companies.** We transfer the data and personal information that we collect to other Wingspan companies, subsidiaries, and related affiliates acting on our behalf for the purposes described in this Privacy Notice.
- **For a merger, acquisition, change in ownership, or reorganization.** Data and personal information we have collected may be disclosed to a third party in the event of a merger, transfer of ownership or assets, bankruptcy, or other corporate reorganization.
- **For data analytics.** We share your data and personal information with analytics service providers such as Google. Google may combine your browsing information, including information from your use of our website, to generate interest-based advertisements.
- **When we are legally permitted or required to do so.** Wingspan may disclose without your prior consent any data or personal information about you or your use of our services, if we believe disclosure is necessary.

Your Privacy Rights

Individuals residing in Africa and certain other jurisdictions may be entitled to various data subject rights. Depending on your country of residence in Africa or otherwise, these rights may vary. The rights may include, but are not limited to, the rights listed above, such as the right to opt out of collection and use, the right to access, the right to data portability, the right to withdraw consent, and the right to lodge a complaint with your relevant supervisory authority.

If you are a citizen of one of these countries and wish to know more about your rights and options, please contact us through the “Exercising Your Privacy Rights” section. We will comply with all applicable laws when handling your personal information.

U.S. Privacy Rights

Certain laws like the California Privacy Rights Act, the Virginia Consumer Data Protection Act, the Colorado Privacy Act, and other state privacy laws that are effective, grant you rights to control your personal information. Consistent with these laws, Wingspan gives you options to access, edit, or remove certain information, as well as choices about how we contact you. Although some of these rights apply generally, certain rights will only apply to limited individuals or circumstances.

- **Right to Know and Access Information.** Note that much of the information you are entitled to know or access is disclosed in this Privacy Notice. With this said, you have the right to know



about our information practices. You also have the right to access the categories of data we collect, with whom we share or sell that information, and, in some cases, what specific personal information we associate with you or your account.

- **Right to Data Portability.** If you request a copy of your specific information then we will provide it in an easily accessible format.
- **Right to Deletion or Erasure.** You may request that we delete the personal information we have collected about you. Depending on the applicable law, in some cases we are required or permitted to retain your information, even if you validly requested we delete or erase it.
- **Right to Correct Information.** You may request we correct or rectify inaccurate information we have collected about you.
- **Right to Limit Use of Information for Advertising.** You may opt-out of our use of your personal information for advertising purposes.
- **Right to Withdraw Consent.** You may withdraw your consent to our data privacy practices.
- **Right to Non-Discrimination.** You have the right to not experience discrimination from us for exercising the rights listed in this section. What we mean by discrimination is denying you access to our services or limiting the quality of our services. However, limiting use of, or deleting, your personal information may restrict the purposes or uses that rely on that information. If you need further assistance, you can contact Wingspan through one of the channels listed below under “Contact.”

Nevada Privacy Rights. Nevada residents have the right to opt-out of the sale of their Personal Information by, emailing us at the contact information below. We will respond to your request within the time required by law and, once verified, we will maintain your opt-out request in the event our practices change. Please note that we do not sell Personal Information in accordance with Nevada law at this time.

Exercising Your Privacy Rights

To exercise any of your privacy rights, either:

- **Email Wingspan at info@wingspanscouting.com**

Please include your email address, full name, and your specific information about your request(s) and, if applicable, specifically what information you do not want to receive. If you would like to update or correct your email address, street address or other personal information with us, please include specific details about the information you wish to have updated or corrected.

For requests submitted by form or email, you must provide enough information that allows us to verify your identity. Only you, or your authorized agent may make requests regarding your personal information. An authorized agent must have documentation that they are authorized to act on your behalf. Wingspan will attempt to fulfill or reject your request within the amount of time required by law.



European Union/Switzerland/United Kingdom Rights

Certain laws, including but not limited to, the General Data Protection Regulation (GDPR) grant you rights to control your personal information. Consistent with these laws, Wingspan gives you options to access, edit, or remove certain information, as well as choices about how we contact you. Although some of these rights apply generally, certain rights will only apply to limited individuals or circumstances.

To the extent that these laws apply, you may exercise the following rights:

- **Right to Access.** Note that much of the information you are entitled to know or access is disclosed in this Privacy Notice. With this said, you have the right to know about our information practices. You also have the right to access the categories of data we collect, with whom we share or sell that information, and, in some cases, what specific personal information we associate with you or your account.
- **Right to Rectification.** You may request we correct or rectify inaccurate information we have collected about you.
- **Right to Erasure.** You may request that we delete the personal information we have collected about you. Depending on the applicable law, in some cases we are required or permitted to retain your information, even if you validly requested we delete or erase it.
- **Right to Restrict Processing.** If we process your information based on our legitimate interests as explained in this Privacy Notice, you may have the right to restrict processing in certain circumstances.
- **Right to Object.** If we process your information based on our legitimate interests as explained in this Privacy Notice, or in the public interest, you can object to this processing in certain circumstances. Where we use your data for direct marketing purposes, you can always object using the unsubscribe link in such communications or changing your account settings.
- **Right to Data Portability.** If you request a copy of your specific information then we will provide it in an easily accessible format.
- **Right to Lodge a Complaint.** You may be entitled to lodge a complaint with your data privacy regulatory authority.

We generally process personal information of those residing in the European Union on the legal basis of Wingspan in performing the function or service you requested. Where appropriate, we may rely on alternate legal bases, such as your consent to certain types of processing. Where we process your personal information on the basis of consent, we will clearly obtain your opt-in consent.

Where you have provided consent to certain data processing, you have the right to withdraw that consent at any time by contacting us. A withdrawal of consent will not affect the validity of our use of your personal information up until the point you have withdrawn your consent.

Canada Rights



To the extent that the Personal Information Protection and Electronic Documents Act (PIPEDA) applies, you may exercise the following rights:

- **Right to Access Information.** Note that much of the information you are entitled to know or access is disclosed in this Privacy Notice. With this said, you have the right to know about our information practices. You also have the right to access the categories of data we collect, with whom we share or sell that information, and, in some cases, what specific personal information we associate with you or your account.
- **Right to Withdraw Consent.** You may withdraw your consent to the processing of your personal information.
- **Right to Correct Information.** You may request we correct or rectify inaccurate information we have collected about you.
- **Right to Lodge a Complaint.** You may be entitled to lodge a complaint with your data privacy regulatory authority.

Your Privacy Choices

Messaging and newsletter communications. You may control how you receive certain types of communications by unsubscribing within the body of the communication. Note that some messages are required, service-related messages like transaction confirmation messages, legal notices, or updates.

Cookies and web tracking technologies. You may limit the automatic collection of information by Google, including the collection of personal information about your online activities over time and across third-party websites or online services, by opting-out of such collection.

Do Not Track Signals. CalOPPA requires us to let you know how we respond to web browser Do Not Track (“DNT”) signals. DNT is a privacy preference you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. For details, including how to turn on DNT, see [here](#). Because there currently isn’t an industry or legal standard recognizing or honoring DNT signals, we don’t respond to them at this time.

Third Party Websites

This Privacy Notice applies only to our website, app, and services. Our website or app may contain links to other websites including those that permit online transactions. We have no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or other third parties we link to from our website. Wingspan does not endorse, approve, or certify these other websites, and we do not guarantee the accuracy, completeness, efficacy, or timeliness of the information contained on those websites. You should check the applicable privacy policy of the website sponsor when linking to other websites.



Security

Wingspan takes reasonable steps to secure your personal information. We maintain physical, electronic and procedural safeguards to ensure that personal information is stored and processed responsibly. However, no internet transmission is ever fully secure, and we cannot guarantee that information transmitted via our website will remain confidential at all times.

Age Restrictions

Wingspan takes children's privacy seriously. By accepting the Privacy Notice through your use of our services, you certify that you are at least 18 years of age or are at least 13 years of age and are using the services under the supervision of a parent or legal guardian who has agreed to be bound by these Terms on your behalf. If you are under the age of 13, you are not permitted to use our services.

Wingspan does not have actual knowledge of any personal information about individuals under the age of 13 whose information has been collected through our website or services. If we become aware that a person submitting information to us is a minor, we delete the information as soon as we discover it and do not use it for any purpose nor disclose it to third parties. If you are a parent or guardian concerned that your child may have provided personal information to us, please contact us at info@wingspanscouting.com.

Changes to Privacy Notice

We may update or change this Privacy Notice from time to time. We will post the changes on our website and will indicate the effective date. Your continued use of services after the changes are effective constitutes your acceptance of the Privacy Notice.

Contact Us

If you have any questions about this Privacy Notice, contact us at:

18410 Barnhardt Rd, Davidson, NC 28036
info@wingspanscouting.com