

# O2E Privacy Notice

**Last Updated:** JULY 25, 2024

**Effective Date:** JULY 25, 2024

O2E Brands Inc., and its affiliates and subsidiaries, together with the franchisor entities of the 1-800-GOT-JUNK?, WOW 1 DAY PAINTING, and SHACK SHINE, franchise systems (“O2E,” “we,” “us,” or “our”) respect your privacy. This Privacy Notice describes the processing of Personal Information (defined below) that is provided, collected, used or disclosed in the course of providing our products or services to you (“Services”) and on the websites, applications, social media pages and other platforms that link to this Privacy Notice (together “Websites”), including when you apply for a job with us. It also describes the rights you may have under applicable laws.

## 1. Personal Information We Collect

We may collect a range of Personal Information. “Personal Information” means information that uniquely identifies, relates to, describes, or is reasonably capable of being associated, directly or indirectly, with or linked to an individual.

The types of Personal Information we collect may include:

**Contact Information** – If you submit an inquiry, register for an account, or provide information on or through our Services, we may collect your contact information. This may include your name, address, email address, demographic information, and phone number.

**Commercial Information** – This includes information about purchases, information about subscriptions, Services you have shown interest in, and other commercial information. If you make any purchases, we will collect your financial information, including your name and payment information. We may use a third-party service, such as Shop Pay, Amazon Pay, Google Pay, Apple Pay, AfterPay, PayPal, or a social media platform, to collect this information.

**Usage Information** – When you use our Websites, our servers may automatically record information, including your Internet Protocol address (IP Address), geolocation of your device, browser type, referring URLs (e.g., the website you visited before coming to our Website), domain names associated with your Internet service provider, or other information regarding your interaction with our Website.

**Professional or Employment-related Information** – If you apply for a job with us, we will collect your employment and work history, as well as other Personal Information related to your potential employment. This may include your education and employment history, address and contact information, demographic information, and any other information included in your resume or application.

**Communication Information** – We may collect the contents of your communications with us, whether via email, chat functionality, social media, telephone or otherwise, and inferences we may make from other Personal Information we collect. Where permitted by applicable law, we may collect and maintain records of calls and chats with our agents, representatives, or employees via message, chat, post, or similar functionality.

## 2. How We Collect Personal Information

To the extent permitted by applicable law, we may collect Personal Information:

**Directly From You** – We collect Personal Information that you provide to us, for example, if you choose to contact us or request or purchase Services or information from us, or if you create an account with us.

**Via Third Parties** – We may collect Personal Information about you via third parties including, business partners, vendors, subcontractors, advertising networks, analytics providers, and search information providers.

**Through Digital Tracking Technologies** – We use cookies and similar technologies such as pixels and web beacons to collect Personal Information related to your online activities, including information that may allow us to see your location. For additional information regarding our use of these technologies, see the *Cookies and Tracking Technologies* section below.

### 3. How We Use Personal Information

To the extent permitted by applicable law, we may use Personal Information:

**To provide and personalize our Services**, such as processing or fulfilling orders and transactions, offering or providing our Services, processing payments, providing customer service, maintaining or servicing accounts, verifying customer information, creating and maintaining business records, operating our franchise business, and undertaking or providing similar services.

**For internal research and development**, such as testing and verifying the quality of our Services, improving the quality of our Services, and creating new Services.

**For marketing**, such as sending information about our Services or those of our affiliates, business partners, or other third parties. This may include using your information to send you messages and notices, newsletters, surveys, promotions, or news about events.

**For communicating with you**, such as responding to your questions and comments and notifying you of updates to our Services.

**For legal, security, or safety reasons**, such as protecting our and our users' safety, property, or rights, complying with legal requirements, enforcing our terms, conditions, and policies, detecting, preventing, and responding to security incidents, and protecting against malicious, deceptive, fraudulent, or illegal activity.

**As part of a corporate transaction**, such as in connection with the sale of part or all of our assets or business, the acquisition of part or all of another business or another business' assets, or another corporate transaction, including bankruptcy.

**If you are applying for a position with us**, we may use your Personal Information for the following purposes. Please note that this Privacy Notice does not form part of any contract of employment offered to job applicants hired by O2E.

**To Manage the Application Process**. We may use your Personal Information to process your job application, to verify the information you have provided in your application, to communicate with you regarding your application, to answer your questions regarding the application process and to confirm your eligibility for a position. We may also save your information for future job openings within O2E.

**To Manage the Hiring Process**. We may use your Personal Information in the hiring process to conduct interviews and manage our hiring process. We may also use your Personal Information to perform background and reference checks, with your consent, if you are offered a position.

**To Manage the Franchisee Application Process**. We may use your Personal Information to process your franchise application and to manage our franchise relationship with you.

**Recruiting**. We may use Personal Information to communicate with you regarding the recruiting process, to learn where you heard about O2E, and to evaluate and improve our recruiting process.

**To Communicate with You.** We may use your Personal Information to provide information to you, to respond to your questions, or to notify you of any changes or updates.

**Other.** We may use your Personal Information as otherwise permitted or required by applicable law.

#### **4. How We Disclose Personal Information**

We may disclose your Personal Information in the following circumstances:

**Service Providers** – We may disclose your Personal Information with third-party service providers as necessary to enable them to support our Services or other aspects of our business.

**Franchisees, Affiliates and Subsidiaries** – We may disclose your information to our franchisees and to the O2E family of companies for their and our business purposes and for marketing purposes, including to provide you information about the products or services we think may interest you and provide our Services.

**Business Partners** – We may disclose Personal Information with trusted business partners or corporate affiliates. For example, we may disclose your Personal Information to a company whose products or services we think may be of interest to you or with which we co-sponsor a promotion or service.

**Legal Obligation or Safety Reasons** – When we have a good faith belief that access, use, preservation or disclosure of Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of any agreement you have with us, (c) detect, prevent, or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety of O2E, its users, or the public against harm.

**Merger or Change of Control** – If we are involved in a merger, acquisition, or any other transaction involving a change of control in our business including but not limited to a bankruptcy or similar proceeding, Personal Information may be transferred along with the business. Where legally required, we will give you prior notice prior to such a transfer.

**Other.** We may disclose your Personal Information as otherwise permitted or required by applicable law.

#### **5. Cookies and Other Tracking Technologies**

Subject to applicable laws, we may use and may allow third parties to enable on our Websites, cookies and similar tracking technologies such as pixels, web beacons, and local storage to collect usage and browser information about how you use our Websites. We process the Personal Information collected through such technologies to help operate certain features of our Services, to enhance your experience through personalization, and to help us better understand the features of our Services that you and other users are most interested in. The Personal Information collected via these technologies may be shared with our third-party service providers, advertisers, and social media partners, in accordance with applicable laws.

We may allow or enable third parties to collect Personal Information in order to provide their interest-based advertising services, and we use Google Ads and other third parties to serve ads for our Services across various websites. To opt in or opt out, as applicable, of this type of advertising by Google, to customize your ad preferences, or to limit Google's collection or use of your data, visit Google's Ad Settings and follow Google's personalized ad opt-out instructions. Refusing to opt in or opting out will not affect your use of our Services.

We use analytics services, including Google Analytics, to assist us with analyzing our Website traffic. These services utilize cookies and other technologies that collect your Personal Information. To learn more about how Google uses data, visit Google's page on "How Google uses data when you use our partners' websites or apps." You may download the Google Analytics Opt-out Browser Add-on for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit Google Analytics Cookie Usage on Websites.

In order to manage your preferences with respect to these technologies, please visit our "Cookie Preferences" page. In addition, most browsers provide you with the ability to block, delete, or disable cookies, and your mobile device may allow you to disable transmission of unique identifiers and location data. If you choose to reject cookies or block device identifiers, some features of our Services may not be available, or some functionality may be limited or unavailable. Please review the help pages of your browser or mobile device for assistance with changing your settings. We do not respond to Do Not Track ("DNT") signals sent to us by your browser at this time.

## **6. How Long Do We Keep Personal Information**

We will retain each category of your Personal Information for as long as necessary to fulfill the purposes described in the *How We Use Personal Information* section above, unless otherwise required by applicable laws. Criteria we will use to determine how long we will retain your Personal Information include whether we need your Personal Information to provide you with our Services you have requested; we continue to have a relationship with you; you have requested information or Services from us; we have a legal right or obligation to continue to retain your Personal Information; we have an obligation to a third party that involves your Personal Information; our retention or recordkeeping policies and obligations dictate that we retain your Personal Information; we have an interest in providing you with Personal Information about our Services; and we have another business purpose for retaining your Personal Information.

## **7. How We Protect Personal Information**

We use commercially reasonable efforts to protect the confidentiality and security of Personal Information we process, including by maintaining appropriate administrative, technical, and physical safeguards that are designed to help protect Personal Information collected or received through our Websites or that you otherwise communicate to us.

We limit access to your Personal Information to our employees whom we reasonably believe need to come into contact with that information to provide our Services to you or in order to do their jobs.

We also implemented a comprehensive set of policies and practices to protect your Personal Information. These measures take into account the volume, sensitivity, intended use, and format of the information, and generally include the following:

- A privacy framework governing the protection of Personal Information throughout its lifecycle. This framework defines, among other things, the roles and responsibilities of our personnel, provides a process for handling privacy complaints, and addresses the retention and destruction of Personal Information;
- Other internal policies and procedures that define the roles and responsibilities of our personnel throughout the information life cycle and limit their access to such information on a "need-to-know" basis;
- When information is collected or stored in electronic format, technical safeguards such as encryption, firewalls, passwords, antivirus software and similar measures;
- A designated Privacy Officer to monitor compliance with applicable data protection laws; and
- Employee privacy and data security training.

However, despite these efforts to store Personal Information in a secure operating environment, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems.

## 8. Your Privacy Rights

Depending on where you live and subject to certain exceptions, you may have the following rights with respect to your Personal Information under applicable data protection laws:

**Access** – You may have the right to know what Personal Information we have collected about you and to access such data.

**Data portability** – You may have the right to receive a copy of your Personal Information in a portable and/or readily usable format.

**Deletion** – You may have the right to delete your Personal Information.

**Correction** – You may have the right to correct inaccuracies in your Personal Information.

**Consent withdrawal** – If we require your consent to process your Personal Information, you may have the right to withdraw your consent from such processing. Such withdrawal of your consent may affect our ability to continue to provide you with our Services.

**Opt out of certain processing** – You may have the right to: (a) opt out of the processing of your Personal Information for purposes of targeted advertising, (b) opt out of the sale or sharing of your Personal Information; (c) limit the use of your sensitive Personal Information (if applicable), and (d) opt out of the processing of your Personal Information for profiling in furtherance of decisions that produce legal or similarly significant effect concerning you.

To opt out of marketing emails, please email us at [legal-department@o2ebrands.com](mailto:legal-department@o2ebrands.com) or by following the instructions included in the email or text correspondence. Please note that, even if you unsubscribe from certain correspondence, we may still need to contact you with important transactional or administrative information, as permitted by law. Additionally, if you withdraw your consent or object to the processing of your Personal Information, or if you choose not to provide certain Personal Information, we may be unable to provide some or all of our Services to you.

To exercise any of these rights available to you, see the ***Exercising Your Individual Privacy Rights*** section below.

## 9. International Use of our Services

We and our service providers may process your Personal Information from time to time across borders, including in Canada and in the United States. The data protection laws of those other countries might be different from the laws of the jurisdiction in which you reside and might permit the government, government agencies, courts, law enforcement agencies and security authorities in those countries to access your Personal Information without notice. Any such transfers will be undertaken in accordance with this Privacy Notice and in compliance with applicable laws.

## 10. Children's Privacy

We do not knowingly collect or solicit any Personal Information from children under the age of 16. In the event that we learn that we have collected Personal Information from a child, we will promptly take steps to delete that information. If you are a parent or legal guardian and think your child has given us their

Personal Information, you can email us at [legal-department@o2ebrands.com](mailto:legal-department@o2ebrands.com) or contact us using the information listed in the *Contact Us* section below.

## 11. Links to Third-Party Websites

We are not responsible for the practices employed by any websites or services linked to or from our Services, including the information or content contained within them. We encourage you to investigate and ask questions before disclosing Personal Information to third parties, since any Personal Information disclosed will be subject to the applicable third party’s privacy notice.

## 12. Notice to California Residents

This section applies to our collection and use of Personal Information if you are a resident of California, as required by the California Consumer Privacy Act of 2018 and its implementing regulations, as amended by the California Privacy Rights Act (“CCPA”), where “**Personal Information**” has the definition set forth in the CCPA.

O2E makes the following disclosures regarding the Personal Information O2E has collected within the 12-month period preceding the Effective Date of this Privacy Policy:

### Sources of Personal Information

We collect Personal Information from the categories of sources detailed in the *How We Collect Personal Information* section above.

### Use of Personal Information

We collect Personal Information for the business and commercial purposes detailed in the *How We Use Personal Information* section above.

### Collection and Disclosure of Personal Information

The categories of Personal Information we collect, and third parties to which we disclose Personal Information for a business or commercial purpose or to whom we sell or share Personal Information, in the past 12 months are summarized in the chart below. We do not knowingly sell or share the Personal Information of minors under the age of 16.

Categories of Personal Information We Collect	Categories of Recipients to Which We Disclose Personal Information for a Business or Commercial Purpose
Identifiers	<ul style="list-style-type: none"> <li>● Affiliates and subsidiaries</li> <li>● Service providers</li> <li>● Business partners</li> <li>● For legal, security, and safety purposes</li> <li>● In connection with a corporate transaction</li> <li>● Entities to which you have consented to the disclosure</li> </ul>
Personal information, as defined in the California customer records law	<ul style="list-style-type: none"> <li>● Affiliates and subsidiaries</li> <li>● Service providers</li> <li>● Business partners</li> <li>● For legal, security, and safety purposes</li> <li>● In connection with a corporate transaction</li> <li>● Entities to which you have consented to the disclosure</li> </ul>

Commercial Information	<ul style="list-style-type: none"> <li>● Affiliates and subsidiaries</li> <li>● Service providers</li> <li>● Business partners</li> <li>● For legal, security, and safety purposes</li> <li>● In connection with a corporate transaction</li> <li>● Entities to which you have consented to the disclosure</li> </ul>
Characteristics of protected classifications under California or Federal Law	<ul style="list-style-type: none"> <li>● Affiliates and subsidiaries</li> <li>● Service providers</li> <li>● For legal, security, and safety purposes</li> <li>● In connection with a corporate transaction</li> <li>● Entities to which you have consented to the disclosure</li> </ul>
Internet or other similar network activity	<ul style="list-style-type: none"> <li>● Affiliates and subsidiaries</li> <li>● Service providers</li> <li>● Business partners</li> <li>● For legal, security, and safety purposes</li> <li>● In connection with a corporate transaction</li> <li>● Entities to which you have consented to the disclosure</li> </ul>
Geolocation data	<ul style="list-style-type: none"> <li>● Affiliates and subsidiaries</li> <li>● Service providers</li> <li>● Business partners</li> <li>● For legal, security, and safety purposes</li> <li>● In connection with a corporate transaction</li> <li>● Entities to which you have consented to the disclosure</li> </ul>
Inferences drawn from other Personal Information	<ul style="list-style-type: none"> <li>● Affiliates and subsidiaries</li> <li>● Service providers</li> <li>● Business partners</li> <li>● For legal, security, and safety purposes</li> <li>● In connection with a corporate transaction</li> <li>● Entities to which you have consented to the disclosure</li> </ul>
Professional or employment-related information	<ul style="list-style-type: none"> <li>● Affiliates and subsidiaries</li> <li>● Service providers</li> <li>● For legal, security, and safety purposes</li> <li>● In connection with a corporate transaction</li> <li>● Entities to which you have consented to the disclosure</li> </ul>

### **Other California Privacy Rights**

Under California Civil Code Section 1798.83, individual customers who reside in California and who have an existing business relationship with us may request information about our disclosure of certain categories of Personal Information to third parties for the third parties' direct marketing purposes, if any. To make such a request, please contact us using the information in the *Contact Us* section below. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

### **13. Exercising Your Individual Privacy Rights**

To exercise any of the privacy rights afforded to you under applicable data protection laws, please submit a request to us by one of the following methods:

- E-mailing us at [legal-department@o2ebrands.com](mailto:legal-department@o2ebrands.com)
- Calling us toll-free

You will not be discriminated against by virtue of your exercise of the rights listed in this Privacy Notice which means we will not deny goods or Services to you, provide different prices or rates for goods or Services to you, or provide a different level or quality of goods or Services to you. Only you, or an authorized agent that you authorize to act on your behalf, may make a request related to your Personal Information. You may also make a request on behalf of your minor child.

We must verify your identity before fulfilling your requests, and we cannot respond to your request or provide you with Personal Information if we cannot confirm the Personal Information relates to you. If we cannot initially verify your identity, we may request additional information to complete the verification process. We will only use Personal Information provided in a request to verify the requestor's identity. If you are an authorized agent making a request on behalf of a consumer, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney. We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

We do not charge a fee to process or respond to your requests unless it is excessive or repetitive. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We may deny certain requests, or only fulfill some in part, as permitted or required by applicable law. For example, if you request to delete Personal Information, we may retain Personal Information that we need to retain for legal purposes.

### **14. Changes to this Privacy Notice**

Please note that we may modify or update this Privacy Notice from time to time, so please review it periodically. We will notify you if material changes are made, as required by applicable law. Unless otherwise indicated, any changes to this Privacy Notice will apply immediately upon posting to our Websites.

### **15. Contact Us**

If you have any questions about our practices or this Privacy Notice, please contact our Privacy Officer at [legal-department@o2ebrands.com](mailto:legal-department@o2ebrands.com). You may also write to us at:

O2E Brands Inc.  
Legal Department  
Attn: Privacy Officer  
301 – 887 Great Northern Way  
Vancouver, BC, V5T 4T5  
Email: [legal-department@o2ebrands.com](mailto:legal-department@o2ebrands.com)  
Telephone: (866) 234-0057