

**THE HAPPY GIRAFFE COMPANY, INC.
MOBILE APPLICATION PRIVACY POLICY**

Last updated: November 26, 2024

This Privacy Policy (the “**Privacy Policy**”) applies to the website HappyGiraffe.org (the “**Site**”) and the mobile application (the “**App**”), owned and operated by The Happy Giraffe Company, Inc. (“**The Happy Giraffe Company,**” “**We,**” “**Us,**” or “**Our**”). We have created this Privacy Policy to tell you what information the App collects, how we use that information, and with whom we will share that information with, if at all. This Privacy Policy does not address the privacy practices of any third parties that we do not own, control, or are affiliated with. Capitalized terms not defined in this Privacy Policy will have the meaning stated in our Terms of Use. By visiting and/or using our App, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use. We encourage you to read the Privacy Policy, and to use the information it contains to help you make informed decisions.

When we offer goods and services to individuals in the European Economic Area (EEA), we are subject to the EU General Data Protection Regulation (EU GDPR), which applies across the entire European Union. For California consumers, we are subject to the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA). We are responsible as a “controller” of that personal information for the purposes of the GDPR. We are responsible for your personal information as a “business” under the CCPA/CPRA.

1. Information We Collect or Receive. In the course of operating the App, we will collect and/or receive the following types of information. You authorize us to collect and/or receive such information.

(a) Personal Information. We only receive or collect information that identifies you personally if you choose to provide such personally identifiable information to us via email or other means. When you sign up to become a user or contact us, you will be required to provide us with Personal Information about yourself (collectively, the “**Personal Information**”). Such Personal Information may include your name, email address, physical address, and phone number. We do not collect any Personal Information from you when you use the App unless you provide us with the Personal Information voluntarily.

(b) Third-party Log In. If you sign in through a third-party company, you are authorizing us to collect, store, and use, in accordance with this Privacy Policy, any and all information that you agreed that a third-party company would provide to us through a third-party company’s Application Programming Interface (“**API**”). Such information may include, without limitation, your first and last name, a third-party company username, a third-party company profile picture, headline, unique identifier and access token, and email address.

(c) Payment Information. If you choose to make a purchase or subscribe to a feature or service of ours that requires a fee, you will be required to provide us with your Payment Information, including, without limitation, bank account numbers, credit card or debit card numbers, account details, ACH information, and similar data (collectively, “**Payment Information**”). Such Payment Information will be collected and processed by our third-party

payment vendors under the terms and conditions of their privacy policies and Terms of Use, and we do not obtain access to any Payment Information in connection with such purchases or subscriptions.

(d) Geolocational Information. Certain features and functionalities of the App are based on your location. In order to provide these features and functionalities while you are using your mobile device, we may, with your consent, automatically collect Geolocational Information from your mobile device, wireless carrier, and/or certain third-party service providers (collectively, “**Geolocational Information**”). Collection of such Geolocational Information occurs only when the App is running on your device. You may decline to allow us to collect such Geolocational Information, in which case we will not be able to provide certain features or functionalities to you.

(e) Third-Party Analytics. We and the third-party technology providers, ad exchanges, ad networks, advertisers, agencies, and ad servers with which we work use third-party analytics services (e.g., Google Analytics) to evaluate your use of the App, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the App and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. You consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. Please be advised that if you opt out of any such service, you may not be able to use the full functionality of the App.

(f) Other Information. In addition to the Personal Information, Payment Information, and Geolocational Information, we may automatically collect or receive additional information regarding you and your use of the App; your interactions with us and our advertising; and information regarding your computer and mobile devices used to access the App (collectively, the “**Other Information**”). Such Other Information may include:

(i) From You. Additional information about yourself that you voluntarily provide to us, such as your gender and your product and service preferences.

(ii) From Your Activity. We may collect or receive information regarding:

(A) IP address, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or mobile device;

(B) Browser type and language;

(C) Referring and exit pages and URLs;

(D) Date and time; and

(E) Details regarding your activity on the App, such as search queries and other performance and usage data.

(iii) About Your Mobile Device. We may collect or receive information regarding:

(A) Type of mobile device;

(B) Advertising Identifier (“IDFA” or “AdID”);

(C) Operating system and version (e.g., iOS, Android, or Windows);

- (D) Carrier; and
- (E) Network type (Wi-Fi, 3G, 4G, LTE).

(iv) From Cookies. We may use both session cookies, which expire once you close the App, and persistent cookies, which stay on your mobile device until you delete them and other technologies to help us collect data and to enhance your experience with the App. Cookies are small text files an app can use to recognize a repeat visitor to the app. We may use cookies for various purposes, including to:

- (A) Recognize your mobile device;
- (B) Personalize your experience;
- (C) Analyze which portions of the App are visited and used most frequently; and
- (D) Measure and optimize advertising and promotional effectiveness.

If you do not want us to deploy cookies in the App, you can opt out by setting your mobile device to reject cookies. You can still use the App if you choose to disable cookies, although your ability to use some of the features may be affected.

2. Information Collected by or Through Third-Party Advertising Companies. We may share Other Information about your activity on the App with third parties for ad distribution and ad optimization (defined as the tailoring, targeting (e.g., behavioral, contextual, retargeting), analyzing, managing, reporting, and optimizing of ads). These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect Other Information for such purposes. Pixel tags enable us and these third-party advertising companies to recognize a browser’s cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site. In addition, we may receive Other Information from advertisers and/or their service providers such as advertising identifiers, IP addresses, and post-conversion data.

3. How to Opt Out of Third-Party Interest-Based Advertising. If you wish to opt out of third-party interest-based advertising, please visit <http://www.networkadvertising.org> and <http://www.aboutads.info/choices> for details on how to do so. Additionally, users of mobile devices can follow the below instructions:

Android Users

For Android devices with OS 2.2 and up and Google Play Services version 4.0 and up: Open your Google Settings app > Ads > Enable “Opt out of interest-based advertising.”

iOS Users

iOS 7 or Higher: Go to your Settings > Select Privacy > Select Advertising > Enable the “Limit Ad Tracking” setting.

iOS 6: Go to your Settings > Select General > Select About > Select Advertising > Enable the “Limit Ad Tracking” setting.

4. How Information is Used and Shared.

(a) You authorize us to use the Personal Information, Payment Information, Geolocation Information, and the Other Information (collectively, the “Information”) to:

- (i) Provide and improve our App;
- (ii) Provide our services;
- (iii) Administer our promotional programs;
- (iv) Solicit your feedback; and
- (v) Inform you about our products and services.

(b) In order to provide our services and administer our promotional programs, we may share the Information with our third-party promotional and marketing partners, including, without limitation, businesses participating in our various programs.

(c) We engage third-party companies and individuals to perform functions on our behalf. Examples may include providing technical assistance, customer service, marketing assistance, and administration of promotional programs. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law.

(d) In an ongoing effort to better understand our users, the App, and our products and services, we may analyze certain Information in anonymized and aggregate form to operate, maintain, manage, and improve the App and/or such products and services. This aggregate information does not identify you personally. We may share and/or license this aggregate data to our affiliates, agents, business, and promotional partners, and other third parties. We may also disclose aggregated user statistics to describe the App and these products and services to current and prospective business partners and investors and to other third parties for other lawful purposes.

(e) We may share some or all of your Information with any of our parent companies, subsidiaries, joint ventures, or other companies under common control with us.

(f) As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Information may be part of the transferred assets.

(g) To the extent permitted by law, we may also disclose the Information:

- (i) When required by law, court order, or other government or law enforcement authority or regulatory agency; or
- (ii) Whenever we believe that disclosing such Information is necessary or advisable, for example, to protect the rights, property, or safety of us or others, including you.

5. Accessing and Modifying Information and Communication Preferences. If you have provided us any Personal Information, you may access, remove, review, and/or make changes to the same by contacting us as set forth below. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located at

the bottom of any of our marketing emails. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases. You cannot opt out of receiving transactional emails related to the App (e.g., requests for support).

We may also deliver notifications to your mobile device (e.g., push notifications). You can disable these notifications by deleting the relevant service or by changing the settings on your mobile device.

6. How We Protect Your Information. We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such Information, nor can we guarantee that the Information you supply will not be intercepted while being transmitted over the Internet. In particular, email sent to us may not be secure; therefore you should take special care in deciding what information you send to us via email.

7. Important Notices to Non-U.S. Residents. The App and its servers are operated in the United States. If you are located outside of the United States, please be aware that your Information, including your Personal Information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use the App, you hereby irrevocably and unconditionally consent to such transfer, processing, and use in the United States and elsewhere.

8. App Stores; External Websites. Your app store (e.g., iTunes or Google Play) may collect certain information in connection with your use of the App, such as Personal Information, Payment Information, Geolocation Information, and other usage-based data. We have no control over the collection of such information by a third-party app store, and any such collection or use will be subject to that third party's applicable privacy policies.

The App may contain links to third-party websites. We have no control over the privacy practices or the content of these websites. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party Privacy Policy and Terms of Use when visiting any other websites.

9. Children. The App is not directed to children under the age of 13. We adhere to the Children's Online Privacy Protection Act (COPPA) and will not knowingly collect Personal Information from any child under the age of 13. We ask that minors (under the age of 13) not use the App. If a child under the age of 13 has provided us with Personal Information, a parent or guardian of that child may contact us to request that such information be deleted from our records.

10. California Consumers: Your Rights Under the CCPA/CPRA. You have the right under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), and certain other privacy and data protection laws, as applicable, to exercise, free of charge:

<p>Disclosure of Personal Information We Collect About You</p>	<p>You have the right to know, and request disclosure of:</p> <ul style="list-style-type: none"> • The categories of personal information we have collected about you, including sensitive personal information • The categories of sources from which the personal information is collected • The categories of third parties to whom we disclose personal information, if any –and– • The specific pieces of personal information we have collected about you <p>Please note that we are not required to:</p> <ul style="list-style-type: none"> • Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained • Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information –or– • Provide the personal information to you more than twice in a 12-month period
<p>Disclosure of Personal Information Sold, Shared, or Disclosed for a Business Purpose</p>	<p>In connection with any personal information we may sell, share, or disclose to a third party for a business purpose, you have the right to know:</p> <ul style="list-style-type: none"> • The categories of personal information about you that we sold or shared and the categories of third parties to whom the personal information was sold or shared –and– • The categories of personal information that we disclosed about you for a business purpose and the categories of

	<p>persons to whom the personal information was disclosed for a business purpose</p> <p>You have the right to opt-out of the sale of your personal information or sharing of your personal information for the purpose of targeted behavioral advertising. If you exercise your right to opt-out of the sale or sharing of your personal information, we will refrain from selling or sharing your personal information, unless you subsequently provide express authorization for the sale or sharing of your personal information.</p> <p>To opt-out of the sale or sharing of your personal information, please contact us using the information provided at the end of this Privacy Policy.</p>
<p>Right to Limit Use of Sensitive Personal Information</p>	<p>You have the right to limit the use and disclosure of your sensitive personal information to the use which is necessary to:</p> <ul style="list-style-type: none"> • Perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services • To perform the following services: (1) Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes; (2) Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with the business, if the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business; (3) Performing services on behalf of the business, including maintaining or servicing accounts, providing

	<p>customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business; and (4) Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business –and–</p> <ul style="list-style-type: none"> • As authorized by further regulations <p>You have a right to know if your sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes.</p> <p>To limit the use of your sensitive personal information please contact us using the information provided at the end of this Privacy Policy.</p>
<p>Right to Deletion</p>	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> • Delete your personal information from our records –and– • Delete your personal information from our records –and– • Direct third parties to whom the business has sold or shared your personal information to delete your personal information unless this proves impossible or involves disproportionate effort <p>Please note that we may not delete your personal information if it is reasonably necessary to:</p>

	<ul style="list-style-type: none"> • Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us • Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes • Debug to identify and repair errors that impair existing intended functionality • Exercise free speech, ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law • Comply with the California Electronic Communications Privacy Act • Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent • Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us • Comply with an existing legal obligation –or– • Otherwise use your personal information internally in a lawful
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	manner that is compatible with the context in which you provided the information
Right of Correction	If we maintain inaccurate personal information about you, you have the right to request that we correct that inaccurate personal information. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.
Protection Against Retaliation	<p>You have the right to not be retaliated against by us because you exercised any of your rights under the CCPA/CPRA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> • Deny goods or services to you • Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties • Provide a different level or quality of goods or services to you –or– • Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services <p>Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your personal information. We may also offer loyalty, rewards, premium features, discounts, or club card programs consistent with these rights or payments as compensation, for the collection of personal information, the sale of personal information, or the retention of personal information.</p>

11. EEA Data Subjects: Promotional Communications. We may use your personal information to send you updates (by email, text message, telephone, or post) about our products and/or services, including exclusive offers, promotions or new products and/or services.

We have a legitimate interest in processing your personal information for promotional purposes (see above “How and why we use your personal information”). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other organizations outside The Happy Giraffe Company for marketing purposes.

You have the right to opt-out of receiving promotional communications at any time by:

- Contacting us at [Hello@HappyGiraffe.org](mailto>Hello@HappyGiraffe.org)
- Using the “unsubscribe” link in emails or “STOP” number in texts or
- Updating your marketing preferences on our App

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products AND/OR services in the future, or if there are changes in the law, regulation, or the structure of our business.

12. EEA Data Subjects: Your Rights Under the EU GDPR

Right to Be Informed	The right to know or be notified about the collection and use of your personal information
Right to Access	The right to be provided with a copy of your personal information (the right of access)
Right to Rectification	The right to require us to correct any mistakes in your personal information
Right to Be Forgotten	The right to require us to delete your personal information—in certain situations
Right to Restriction of Processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g., if you contest the accuracy of the data
Right to Data Portability	The right to receive the personal information you provided to us, in a structured, commonly used, and machine-readable format and/or transmit that data to a third party—in certain situations
Right to Object	The right to object:

	<ul style="list-style-type: none"> • At any time to your personal information being processed for direct marketing (including profiling) • In certain other situations to our continued processing of your personal information, e.g., processing carried out for our legitimate interests
Right Not to Be Subject to Automated Individual Decision-Making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the EU General Data Protection Regulation.

13. How to Exercise Your Rights. Based on the applicable laws of your country or state of residence in the US, you may have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to request we limit the use or disclosure of your personal information or withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. If you would like to exercise any of your rights as described in this Privacy Policy, you can do so by using the contact details found at the end of this Privacy Policy.

14. Changes to This Privacy Policy. This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. Any such changes will be posted on the App. By accessing the App after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by the Privacy Policy in effect at the time we collect the Information. Please refer to this Privacy Policy on a regular basis.

15. How to Contact Us. If you have questions about this Privacy Policy, please email us at Hello@HappyGiraffe.org with "Privacy Policy" in the subject line, or mail us at 7474 N Dogwood Rd, Eagle Mountain, Utah 84005.