

REAL TREASURE, LLC

PRIVACY POLICY

Effective Date: August 1, 2024

Introduction

Real Treasure, LLC (“TREASURE HUNT”, “we,” “us,” or “our”) conducts contests and events (collectively, “Services”) for members of the general public (“you”). We collect Personal Information necessary to administer and manager our Services. Personal Information is information that specifically identifies an individual. Personal Information can include, but is not limited to, your name, home address, e-mail address, phone number, and credit card information. Personal Information also includes specific types of information defined under locally applicable law.

This Privacy Policy (“Policy”) applies to personal information collected through TREASURE HUNT’S website, entry forms, social media applications and application and registration information associated with our services.

This Privacy Policy explains the types of information we gather and what we do with it, and is intended to provide you notice of TREASURE HUNT’s information management practices, including how the information is gathered, safeguarded and the degree to which you may control the maintenance and sharing of your information.

Your use of any of TREASURE HUNT’s Services, or its websites or social media pages, constitutes acceptance and agreement with this Privacy Policy and any other applicable terms.

Please note that our privacy program is designed to comply with the laws of the United States of America and the individual U.S. States. We do not market to or provide services for persons located outside the United States. TREASURE HUNT’s Services and websites are intended for use only in the USA by lawful residents or citizens of the USA. All other use is prohibited.

We are committed to protecting the privacy of your information. Please take a moment to read this Policy to understand how we collect, use, store, and delete Personal Information about you when you visit and/or use the Site; or use any of our Services.

Policy Integration

What Types of Information Do We Collect?

Information You Voluntarily Provide

TREASURE HUNT collects Personal Information that you and others voluntarily provide when you apply or register to participate in a contest or event, use our Services, or use our websites. This includes information provided when registering; entering a sweepstakes or contest sponsored by us; signing up for Services; sending us an email message; or otherwise communicate to us verbally or in writing.

When you provide us with Personal Information, you agree to provide accurate, complete and true information. You agree to not use a false or misleading name that you are not authorized to use.

In order to provide our Services we need to collect and store Personal Information. The types of information we collect from you may include: first and last name, email address, telephone number, and mailing address and any other information you choose to provide in connection with our Services.

Information Your Web Browser Provides

When you visit our websites, or social media pages, we may automatically collect information provided by your web browser. This information includes, but is not limited to: your IP address, browser type, domain names, access times and referring website addresses. This passively collected data is used to administer, operate, and improve the Site and Services, and to provide individualized advertising to you. We may use IP addresses and device data to identify a user who is noncompliant with our Terms of Use, or to protect our websites site or other users.

We may also use information in the aggregate that has no personal identifying characteristics to understand aggregate user and customer behavior. Non-personally identifiable information is not treated the same as Personal Information and we may use and disclose such information for various purposes.

Cookies and Similar Technology

As noted above, we may use cookies and other technology to collect information, provide Services, and support features of the Site.

Information from Other Sources

We may receive information about you, including Personal Information, from third parties. We may combine this information with other Personal Information we maintain about you and such information will be handled under the terms of this Privacy Policy.

How Do We Use and Share Personal Information?

Use

We use collected Personal Information to facilitate our events and contests, provide information and Services you request; to operate, improve, and maintain our operations and websites and Services; to prevent fraudulent use of our systems; to enforce our Terms of Use or comply with laws; to individually tailor communications to you; to maintain a record of how you use our Services and platforms; for administrative purposes; and for any other purposes that we may disclose to you when we request Personal Information and your consent to use it.

We may use Personal Information to send you marketing materials that we believe might match your interests. You are able to opt-out of these marketing materials by using a link within the materials themselves.

We may use location or other information that you provide to better deliver personalized content to you.

We may also use your Personal Information (such as search terms) to optimize our exposure and availability on external web search engines such as Google.

Sharing

There may be times when we need to share your Personal Information with third parties to provide you Services, for the proper functioning of website features, to comply with the law, and for other lawful bases consistent with locally controlling laws and regulations. The occasions when we will share your Personal Information because of these reasons are explained below.

Service Providers

We use third parties to assist us with providing our Services and we may share your Personal Information with these third-party Service Providers to help us to serve you. We limit the amount and types of Personal Information we share with Service Providers to what they need to reasonably perform their functions. We also required Service Providers to comply with a privacy policy that is at least as restrictive as this Policy.

Business Transfers

We may disclose and transfer Personal Information to a third party in the event that a merger, acquisition, debt financing transaction, sale of our assets, other similar transaction, bankruptcy, insolvency, or receivership occurs. The third party would thereafter be entitled to review and use such information (including Personal Information) in connection with its business activities, and in such case, the Privacy Policy of the third party may thereafter apply to such information, rather than this Privacy Policy.

Legal Protection

We may disclose Personal Information if we believe we must to comply with a law, or if disclosure is in our interest to protect property or other legal rights. This may include

disclosing Personal Information to enforce contracts and agreements, to protect the rights or property of others, or to help protect the security of our Service and the information of other users.

Location Information

We may share aggregate, non-personally identifiable location information with third parties to assist in understanding our user's interests and usage of our Site and Services.

Online Analytics

We may use Google Analytics to help us understand how you use our Services. Google Analytics collects data about your traffic via Google advertising cookies and anonymous identifiers, as well as data collected through standard Google Analytics implementation. We strive to adhere to Google Analytics Advertising policies.

We will not facilitate the merger of personally identifiable information with non-personally identifiable information collected through any Google Advertising product or feature.

We reserve the right to test, turn-on, or turn-off any of the Google Analytics features from time-to-time without notice to you. By utilizing certain Google Analytics Advertising features, we are required to disclose the following information:

We use the following Google Analytics Advertising Features: Google Analytics.

Our websites and other third-party vendors may use first-party cookies (such as the Google® Analytics cookie) or other first-party identifiers, and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together. Visitors can opt-out of the Google® Analytics Advertising Features used, including through Ads Settings, Ad Settings for mobile apps, or any other available means (for example, the NAI's consumer opt-out).

You may revoke your consent to the use of web analysis at any time, either by downloading and installing the provided [Google Browser Plugin](#) or by following your internet browser's instructions to enable, disable, or clear cookies.

Further information on Google Analytics is available in the [Google Analytics Terms of Use](#), the [Privacy and Data Protection Guidelines of Google Analytics](#) and in the [Google Privacy Policy](#).

Data Retention

We store the information we collect about you for as long as is necessary for the purpose(s) for which we collected it and in accordance with applicable law and legitimate business interests.

When assessing the data retention period, we take into account the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the information, the purposes for which we process the data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Security of Information

We utilize reasonable and appropriate security measures in place to protect against the loss, misuse, and alteration of any personal information we receive about you. We maintain appropriate security standards to protect the personal information that we maintain.

Unfortunately, no data transmission or storage can be guaranteed to be completely secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) we cannot control security and privacy indefinitely; (b) the security, integrity, and privacy of information or data exchanged between you and us cannot always be guaranteed; and (c) any such information and data may be viewed or compromised when in transit by a third party.

Accuracy of Information

We strive to keep our records accurate and will make appropriate corrections when you notify us. Please let us know if there is incorrect information in any communications that you receive from us. If you would like to correct or update your personal information, please contact us at adventure@utahtreasurehunts.com.

Deletion

If you submit a request that we delete your account for any Services, we will respond to your request in a reasonable time. We may need to retain certain Personal Information to comply with legal obligations, and we will always retain aggregate, non-personal information collected.

Special Disclosures

“Do Not Track” Disclosures

California and Delaware require websites accessible by users based in those states to indicate whether the website respects “Do Not Track” browser settings. We follow the standards explained in this Privacy Policy and do not interact with or implement “Do Not Track” requests.

Children

Our Services and websites are not directed at children under the age of 18, and we do not knowingly collect Personal Information from children under the age of 18 without obtaining parental consent. It is our procedure to promptly delete any Personal

Information collected from a child under the age of 18 upon discovery of such a circumstance. If you believe that we may have collected Personal Information from a child under the age of 18, please contact us using the contact information at the end of this Policy and we will take appropriate steps to rectify this inadvertent collection.

Your California Privacy Rights

If you a consumer located in California and we collect your personal information, the California Consumer Privacy Act (CCPA) may apply to you. In such a case, our Supplemental CCPA Privacy Notice will apply and will control in the event of any conflict with this general Privacy Policy.

Likewise, other California Privacy laws may apply to you in certain circumstances.

Pursuant to California Business and Professions Code Section 1798.83 (or such successor provision), as amended and supplemented, residents of California have the right to request from a business with whom the California resident has an established business relationship certain information with respect to the types of Personal Information the business shares with third parties for those third parties' direct marketing purposes and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year.

In addition, an operator of a commercial website subject to California Business and Professions Code Section 22581 must allow California residents under age 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted. If this applies to you and you wish to make such a request, your request should include a detailed description of the specific content or information to be removed. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

If you are a California resident, believe that one of the above code provisions applies to you, and would like to make such a request, you may submit a written request using the contact information located at the end of this Privacy Policy. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address.

Visiting our websites Site from Outside of the United States

Although our websites may be accessible in some locations outside of the United States, it is not our intention to offer Services to individuals located outside of the United States via the Site. Any information we collect via the Site will be stored and processed in the United States and if you are located outside of the United States, the laws of the United States may offer less protection than the laws of your place of residence. We will collect and maintain any Personal Information only as long as we need it for the purposes outlined in this Privacy Policy. By providing your Personal Information to us

through your use of the Services or website, you agree to our transfer, storage, and processing procedures based in the United States. Please note that different regions and countries can have their own privacy and data security laws; some of which may be less protective of your Personal Information than the laws of your own region or country.

In the event that we collect or process Personal Information subject to the GDPR, we will comply with the requests of European data subject requests to: (1) access Personal Information, (2) have inaccurate or unnecessary Personal Information rectified or deleted, or (3) stop using your Personal Information in a certain way. If your use of our Services or Site is subject to GDPR you would also have a right to lodge a complaint with your local EU regulator.

Likewise, in the event we collect or process Personal Information subject to the laws of another jurisdiction, we will comply with the laws of that jurisdiction to the best of our knowledge and understanding.

Changes and Updates to this Policy

We reserve the right to change this Privacy Policy at any time.

When we make changes to this privacy notice, we will post the updated notice on our website and social media pages Site and update the notice's effective date. **Your continued use of our Services or websites following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions about this Privacy Policy, please contact us at: adventure@utahtreasurehunts.com.

Real Treasure, LLC (“TREASURE HUNT” – Privacy Notice for California Consumers

Effective Date: **August 1, 2024**

This Privacy Notice for California Consumers (the “Notice”) supplements the information contained in our general Privacy Policy.

We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice. This Notice controls to the extent of any conflict with our general Privacy Policy and is limited to our collection and use of personal information (defined below for purposes of this Notice) of residents of the State of California who are included in the definition of “consumer” under the CCPA (“consumers” or “you”). To the extent temporarily exempted from application of the CCPA, this Notice does not apply to employment-related personal information collected from California-based employees, job applicants, contractors, or similar individuals (“employment information”) or to personal information reflecting a written or verbal business-to-business communication (“B2B personal information”). For clarity, to the extent required by Cal. Civ. Code 1798.100, this Notice does apply to employment information in so far as the law requires disclosure at or before the point of collection of the categories of personal information to be collected and the purposes for which the categories of personal information shall be used.

This CCPA Notice applies to personal information through our Services, including websites operated by or for us (each our “Site”), unless we expressly incorporate a different policy in connection with such other Services, such as by internet link on a website, express incorporation by reference in a contract, or other presentation or display to users.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“personal information”). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, we have collected the following categories of personal information from its consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES

B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Use of Personal Information

We may use, or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request to participate in our Services, we will use that personal information to respond to your inquiry. If you provide your personal information to Participate in our Services, we will use that information to facilitate our Services.
- To provide, support, personalize, and develop our Sites, products, and services.
- To create, maintain, customize, and secure your relationship with us.
- To process your requests, and prevent fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Sites, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Sites, products and Services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Sites, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Sites users/consumers is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, TREASURE HUNT has not disclosed personal information for a business purpose.

In the preceding twelve (12) months, TREASURE HUNT has not sold personal information.

We do not sell personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request using the contact information provided at the end of this CCPA Notice.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), 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.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. 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.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Sites that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to adventure@utahtreasurehunts.com or write us at 226 N. 200 West, Salt Lake City, UT 84103.

Changes to Our Privacy CCPA Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Sites and update the notice's effective date. Your continued use of our Sites following the posting of changes constitutes your acceptance of such changes.

Contact Information

If you have any questions or comments about this notice, the ways in which TREASURE HUNT collects and uses your information described here and in the Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Email: adventure@utahtreasurehunts.com

Postal Address: 226 N. 200 West, Salt Lake City, UT 84103