

# **PetPlace® Privacy Policy**

Online Information Practices and Cookie Notice

[California Notice at Collection](#)

Effective: 3/3/2026

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## **Overview**

PetPlace® is a trademarked brand owned by Independence Pet Holdings, Inc., hereafter referred to as “PetPlace”, and its subsidiaries and affiliated brands including but not limited to ByteTag, 24Pet, 24PetConnect, Chameleon, PetPoint, 24PetShelter, 24PetRescue, 24PetWatch (collectively referred to as “Company,” “we,” “us” or “our”) and is committed to protecting your privacy, and the confidentiality and accuracy of your Personal Information.

PetPlace is a platform that supports you through every step of your pet-parenting journey with advice and education, trusted advisors, and helpful tools and services. We guide you through pet adoption and acquisition, provide educational pet care resources to support health and wellbeing, and assist you in keeping your pet safe and protected throughout all stages of their life.

This Privacy Policy explains how Personal Information will be collected, used, or disclosed. Your rights, obligations, and options regarding your Personal Information (defined below) are outlined herein. Throughout this policy, this website and all other PetPlace websites will be referred to as the “Website” or “Websites”. Services provided by or enabled via the Websites will be referred to as the “Products” or “Services”. The term “Customer” also refers to anyone who might visit our Website(s) or purchase our Products and may be referred to collectively in this document as “you”, “your” or “yours”.

Through continued use of our Website and/or by completing a transaction with us, you authorize and consent to the processing of personal information as described in this Privacy Policy. This policy may change from time to time and your continued use of our Websites and Services is deemed to be acceptable of such changes, so please check the policy periodically for updates. We are not responsible for the content or privacy practices of third-party sites to which this Website, or any other PetPlace Website, may link.

## **PetPlace Software Platforms**

In addition to the Website(s), PetPlace operates software and cloud-based software for businesses and non-profit Customers. The use of information collected through these platforms is strictly limited to the purpose of meeting our contractual obligations to our Customers and providing the services requested by our Customers.

## **What Personal Information Do We Collect?**

“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 individual or household.

The information we may collect may include but is not limited to:

- First and Last name
- Address
- Email Address
- Telephone Number
- Unique numerical identifiers such as an IP address or mobile device identifier
- Geolocation data or precise geolocation based on product capability
- Financial Information

- Information related to products and services purchased, and data concerning website traffic and visits to the extent that such data is connected to a person's Personal Information.
- Audio, electronic, visual, or other similar records

Personal Information does not include information anonymized through the removal of identifying details in a way that ensures the data can no longer be connected to an individual.

## **Your Consent**

Your consent may be obtained in various ways. We may obtain your express consent, or we may determine that consent has been implied by the circumstances. Express consent could be in writing, web forms, or verbally in person or over the phone. When we receive Personal Information from you through our Website, by phone or by mail that enables us to provide you with a requested Product or Service, you consent to allow us to deal with that Personal Information in a reasonable manner. Except in cases where consent is not legally required, we identify the reasons for the collection of your Personal Information.

It is important that you understand and consent to our collection, use, and disclosure of your Personal Information. We rely on the following actions by you as indications of your consent to our existing and future use of your Personal Information for identified purposes, until you notify us of a withdrawal of your consent:

- Your voluntary provision of Personal Information directly to us and our affiliates through our Website(s) in relation to one or more of our Services.
- Your consent is given through your authorized representative such as a legal guardian, agent, or holder of power of attorney.

By providing Personal Information about a third party such as a family member, emergency contact, or secondary owner by any of the above methods, you represent that you have obtained their consent to the collection, use, and disclosure of such Personal Information in accordance with this Privacy Policy.

In the event you request changes, endorsements, renewals or other Products and Services, the original consent provided directly to us, or indirectly through a third party, will remain in effect. If our terms and conditions change, we will notify you at the time of change.

## **Why We Collect and Use Personal Information**

Collecting Personal Information about you is essential to provide you with the Products and Services that best meet the needs of you and your pet. Your decision to withhold information may limit or affect the quality of service that we can provide to you. We collect, use, and disclose Personal Information (including to and from our affiliates and/or subsidiaries and/or third-party service providers / suppliers) for the following purposes:

- Manage our Products and Services.
- Respond to your comments, questions, emails, and other requests, and to provide customer service.
- Send you technical notices, updates, security alerts, information regarding changes to our Policies, and support and administrative messages.
- Prevent and address fraud, breach of policies or terms, threats or harm, or other illegal activity.

- Monitor and analyze trends, usage, and activities.
- Conduct research, including surveys, focus groups, or other insight gathering methods.
- Send you marketing communications or advertisements, offers, promotions, rewards, contests, third-party products, and events we think may be of interest to you.
- Fulfill any other purpose disclosed at the time you provide Personal Information.
- For internal, external, and regulatory audit purposes.
- To comply with the law or other legal process, and where required, in response to lawful requests by law enforcement or other public authorities, search warrant, or subpoena, including to meet national security or law enforcement requirements; to protect the integrity of the Service or company if we believe that a user has committed unlawful or otherwise harmful acts; or to protect our interests relating to a legal proceeding.
- To protect the rights, property, life, health, security, and safety of us, the Service, or any affiliate or third party, or if we believe such disclosure is in your vital interest.
- In connection with, or during negotiations of, any proposed or actual merger, purchase, sale, consolidation with or any other type of acquisition or business combination of all or any portion of the Service or our assets, or transfer or all or a portion of our business to an affiliated entity or third party.
- With your consent, precise geolocation through GPS signals to obtain your location for purposes of providing the ByteTag service.
- With our affiliates for internal business purposes and other entities that operate websites for us.
- With our affiliates and other third parties, including audience profiling and direct marketing purposes
- For purposes disclosed at the time you provide Personal Information; and with your consent or discretion.
- We may share aggregated information which does not identify you or de-identified information about you or information obtained from public sources with third parties or affiliates for any purpose.
- To recognize you and identify your preferences on our Website, social media, email platforms, and to analyze their use, improve, and personalize their content.
- To communicate with you regarding any changes to our programs and their operations.
- To facilitate payments, we may use an external party on our behalf such as a payment processor when you engage in a transaction on our Website in which payment information is not stored.

In this Privacy Policy, the above list of identified purposes will be referred to as “Identified Purposes.” PetPlace will not process or disclose your Personal Information to any third party, for any other purpose except as identified or permitted by law. If your Personal Information is used or disclosed for any purposes not related to the Identified Purposes, we will first obtain your consent for such purpose, except where prohibited by law.

**Additional Information for ByteTag Users:** We may also collect information about the marketing and advertisements you have seen or clicked on from online advertising companies, information about your social media accounts such as a profile photo if you choose to connect your ByteTag account to your social media platform, when you register for the ByteTag mobile application and if you purchase a ByteTag subscription, we receive your subscriber ID, information about the subscription you purchased, and country of residence. If you apply to become a part of ByteTag’s Ambassador program, we may require the collection of related information including your contact information, submitted application photos, social media links,

and PayPal account information. To learn more about our ByteTag Ambassador program, visit the [Ambassadors](#) page on the ByteTag Website.

## **How We Collect Personal Information**

PetPlace may collect Personal Information from Customers, and prospective employees in several ways, including verbal, written, and electronic forms, through the Web, by telephone, mail, email, SMS, and chat (as applicable), through its authorized third-party business partners, affiliates, or otherwise, including but limited to, when you:

- Register for our Products or Services through our Website.
- Request or obtain a quote for pet insurance through the insurance aggregator.
- Register a microchip, including transfer of ownership.
- Complete a transaction with us, our affiliated companies, or our third-party marketing partners.
- Participate in our contests, promotional offers or receive discounts or benefits.
- Participate in a survey or customer research by us.
- Public Records.
- Sign up or accept to receive newsletters, promotional and marketing emails, or other communications from us concerning our products, services, promotions, or events.
- Visit our Website or social media platforms or interact with emails or online advertising. For more information, please review the [Cookies and Digital Marketing](#) section of this document.
- Contact, interact, or communicate with one of our representatives to submit a request for Service, employment application, remark, question, or complaint. In this regard, because some of our services are provided by telephone, the calls may be recorded to ensure the quality of our services and to protect both parties in the event of a disagreement.

When we receive Personal information from you through our Website(s), by phone or by mail that enables us to provide you with a requested Product or Service, or to respond to a specific question, request, or complaint, you consent to allow us to deal with that Personal Information in a reasonable manner.

## **Product-Related Information Collection**

PetPlace collects certain additional information in connection with the use of our Services, web-based products, or software solutions. Information collected at this time is necessary to deliver service and support to you regarding your inquiry.

If you are seeking support on behalf of a business, you can reach our team at [24Pet Support](#). If you are a pet owner, or have questions about any PetPlace product or service, you may contact our support team at <https://www.petplace.com/contact-us>.

## **Pet Medical and Demographic Information**

We obtain or share your pet's medical and/or demographic information only in connection with specific products and services. This may include, but is not limited to, registering your pet microchip, updating your PetPlace account with pet details and medical history. We have implemented measures designed to secure your pet's medical information from accidental loss and from unauthorized access, use, alteration, and disclosure.

## **How Long Do We Keep Your Data**

We will only collect, use, or disclose Personal Information that is necessary for the Identified Purposes. We will retain your Personal Information only as long as necessary to accomplish the Identified Purpose or to satisfy our legal or business obligations, including for the purposes of satisfying any legal, tax, accounting, or reporting requirements.

Some of the factors considered when determining the appropriate retention period for Personal Information, include the amount, nature, and sensitivity of the Personal Information processed, the potential risk of harm from any unauthorized use or disclosure of your Personal Information, the purposes for which we process your information, and applicable legal and contractual requirements.

As explained in the [“How May I Make A Request”](#) section, you can request the deletion of your Personal Information. Once the purposes for processing the information have been fulfilled and the Personal Information is no longer required due to legal or regulatory requirements, we will delete it. In some circumstances we may permanently anonymize your Personal Information so that it can no longer be used to identify you in any way, in which case we may use the anonymized data without further notice to you.

## **How We Share Personal Information**

To manage our Products or Services, we may share your information as allowed or required by law. We may share your information with our affiliates, service providers, or third parties outside of the Company to service, market, or sell our products and Services to you. We rely on contractual agreements with affiliates, service providers, and third parties which sell our Products and Services which include requirements for the protection and limitation of usage of your data.

We may disclose Personal Information that you provide via this Website to the following third parties:

- Our subsidiaries and affiliates.
- Third parties offering products or services included with the purchase of a PetPlace product, or an insurance product where available.
- Contractors and service providers we use to support our business, for example legal services, human resources management and training companies, collection agencies, marketing or other creative or promotional agencies, information technology services and products companies and cloud, webhosting, and data processing services.
- Third-Party Data Analytics and Third-Party Marketing partners.
- Veterinarians to assist with registering your pet.
- Animal Shelters.
- Other emergency services personnel who have scanned your pet’s microchip and have access to our services.
- In the event of merger, acquisition, or any form of sale of some or all our assets, in which case Personal Information held by us about our customers will be among the assets transferred to the buyer.

We may also disclose your Personal Information to third parties to:

- Comply with any court order or other legal obligations.
- Enforce or apply our Terms of Use.

- Protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

The independent insurance agents and brokers who sell insurance products or services through the insurance aggregator are not our employees and are not subject to our Privacy Policy. Contact your agent or broker to learn more about their privacy practices.

## **Sweepstakes, Contests, and Promotions**

PetPlace may offer sweepstakes, surveys, contests, and other promotions (hereafter referred to as “Promotion”) jointly sponsored or offered by third parties that may require submitting Personal Information. If you voluntarily choose to enter or participate in a Promotion, your Personal Information may be disclosed to third parties for administrative purposes and as required by law (e.g., on a winner’s listing). By entering, you agree to the official rules that govern that Promotion, and may, except where prohibited by applicable law, allow the sponsor and/or other parties to use your name, voice, and/or likeness in advertising or marketing materials.

## **Links to Other Websites**

Our Website contains links to other websites for informational or resource purposes. These other websites are not under our direct control, and they may collect information about you that we do not. We are not responsible for the privacy practices or the content of linked websites. We encourage you to reference the privacy policies of third-party websites and/or mobile applications before providing any Personal Information to them.

PetPlace occasionally creates partnerships with other companies to generate a unique, trackable URL to promote third-party Products or Services, known as an Affiliate Link. In certain cases, we may display advertisements on our Website which may direct to other stores by way of an Affiliate Link, generating a commission on the purchase of those Products or Services, at no additional cost to you. Note that not all links that are posted on our Website are Affiliate Links, and advertisements are indicated as such.

## **Marketing and Other Communications**

**Social media:** As an extension of our internet presence, PetPlace, has social media accounts on, but not limited to, Facebook, Instagram, LinkedIn, X, YouTube, TikTok, and Pinterest. The social media accounts of businesses are public, and therefore we recommend anyone who chooses to interact via social media should first read the terms of use and confidentiality and privacy policies of those platforms to inform themselves of how Personal Information is used by those platforms. Since all content posted on any PetPlace social media accounts can be viewed publicly, we recommend users exercise caution when providing or disclosing Personal Information or details about themselves.

PetPlace often offers content or discussions on our social media accounts, which, depending on your account settings, you may allow us to access certain Personal Information associated with your social media account(s). We may also collect the date and time you visited the page for the purpose of sharing. PetPlace may use this information to confirm your identity and personalize your experience. We may also use the services provided by social media platforms to display targeted advertisements intended for the users of such platforms.

**Email and advertising targeting:** PetPlace strives to manage all email addresses responsibly and in compliance with applicable laws. Therefore, pursuant to express consent you have given us, or implied based on the circumstances, PetPlace may send you promotional messages by email, unless you unsubscribe from such emails.

To better understand and improve the effectiveness of our email marketing efforts, when we send you an email for marketing purposes, we collect information to assess the open rate and to know whether you clicked on the links in the email, and which of our Websites you visited.

You may remove your name from our mailing list at any time by following the unsubscribe link displayed at the bottom of every advertising email from PetPlace. We will then remove your name from our electronic mailing lists within 10 business days after receiving your request. Note that while you may unsubscribe from our commercial messages, certain specific situations such as invoicing Products or Services such as membership will allow us to send you emails in accordance with the exceptions provided by law.

**Text Communications:** PetPlace may utilize text messaging, or SMS, for communications to our customers, and we ensure compliance with all applicable laws for responsible SMS communication. Therefore, to receive SMS updates and promotions from PetPlace, we will always ask for your express written consent before communicating with you. Message and data rates imposed by your mobile provider may apply. Text message opt-in originator will not be shared with affiliates or third parties for marketing purposes without your consent.

If you choose to opt-out of receiving promotional SMS communications, you may do so at any time by simply responding "STOP" to our messages or by clicking the unsubscribe link in the message. However, we may continue to periodically communicate with you via SMS for non-promotional matters. To opt-out of these messages, you can update your communication preferences in your profile.

## **Cookies and Digital Marketing**

PetPlace Websites may use certain automated tools including cookies, browser analysis tools, server logs, and web beacons to offer you a more customized browsing experience, to better recognize your needs, to follow trends, to target marketing initiatives and to offer you content that is more relevant to you. Third-party services may also be utilized to gather and analyze data about the areas visited on the Websites (such as the page most frequented, time spent, search terms used and other engagement information) to further enhance the user experience.

**Cookies:** Our Websites utilize cookies. A cookie is a small file stored on your computer or other browser-enabled device. We use cookies to enhance our Websites, personalize the user experience, improve search speed, and identify when users revisit our Website. These cookies do not read data from your device or other websites' cookies. You have the option to refuse cookies by selecting the appropriate setting within your browser. However, if you choose to select this setting, it may impact your ability to access certain parts of our Websites.

**Targeted data made available by digital marketing service providers:** We could also utilize services provided by third-party platforms e.g., Search and social media to present targeted advertisements, based on the user data collected by such platforms. In general, the way you engage with and receive advertisements on those platforms is governed by each platform's respective privacy policy, terms of use and preference options. We may also sometimes use the third-party platforms to offer users more targeted advertising, based on multiple factors such as the platform's user data and interactions with us outside of the platform, as applicable.

**Web Beacons:** Website pages may contain electronic images known as web beacons or single-pixel gifs which allow us to count visiting users as well as record.

**Usage Details and IP Addresses:** While you navigate around our Website, we may also collect information about your visit, including, but not limited to: traffic and location data and logs, other communication data resources that you access, as well as information about your device and internet connection, including your IP address, operating system and browser type, for system administration and to report aggregate data to our advertisers. This is considered statistical data and does not identify any individual.

You may opt out of tracking cookies or control how information collected by cookies is used through your browser or using the cookie widget on the Website(s), or the “Do Not Sell or Share My Personal Information” link on the Website(s).

**Global Privacy Control:** Our Website is enabled to receive and apply privacy preferences through Global Privacy Control. To learn more about Global Privacy Control, visit <https://globalprivacycontrol.org>.

## Web Analytics

PetPlace may use analytics tools from Google, Inc. or other providers to evaluate data and to analyze the browser behavior of visitors to our sites as well as to understand the allocation and the result of traffic sources. We do not collect personally identifiable information automatically, but we may tie any information collected through cookies to information you may have previously submitted. Google Analytics provides tools to opt out of their services. To opt out of Google Analytics Cookies, visit <https://myadcenter.google.com/home> and the [Google Analytics Opt-out Browser Add-on Download Page](#).

This site protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply.

When your computer or device requests page access on one of our Websites, the data gathered for web analytics may include, but may not be limited to date and time accessed, IP address (not including any visitor identifying details), browser and operating system, and pages visited and any documents downloaded.

For additional information and resources related to analytical tools and the use of data, please refer to Google’s website directly.

## How Do We Protect Your Data

We have implemented measures to include technical, physical, and administrative controls designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. All the information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted.

Where we have given you (or where you have chosen) a password for access to certain parts of our Website(s) you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Please note that the information you share in public areas of the Website(s) or mobile application, such as comments, may be viewed by any user of the Website(s).

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your

Personal Information transmitted to our Website(s) or mobile application. Any transmission of Personal Information is at your own risk.

## **International Transfer**

PetPlace is based in the United States and the information we and our Service Providers collect is governed by U.S. law. If you are accessing the Service from outside the U.S., please be aware that information collected through the Service may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of the Service or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of your information, including Personal Information, in the U.S. as set forth in this Privacy Policy.

## **Browsers & Security**

Wherever possible, we use Secure Socket Layer (SSL) encryption technology. SSL protects information as it crosses the Internet. You can tell if you are visiting a secure area by looking at the padlock symbol at the bottom of your browser screen. If it is "locked," you have a secure session.

## **Accuracy of Your Information**

If you need to update your information, you may do so within your PetPlace profile. You may also request the information we have about you that is inaccurate or incomplete to be updated by contacting the following and include your name, address, email, and telephone number.

If you are seeking support on behalf of a business, you can reach our team at [24Pet Support](#). If you are a pet owner, or have questions about any PetPlace product or service, you may contact our support team at <https://www.petplace.com/contact-us>.

## **Pet Adoption Resources**

If you'd like to learn more about an animal you found through [PetPlace's adoption search tool](#), you can find the shelter's phone number and address on their Pet Profile page. If you need help getting in touch with a shelter, please reach out to us at [info@petplace.com](mailto:info@petplace.com).

Our content and products are for informational purposes only. PetPlace does not provide medical advice, diagnosis, or treatment. If you feel your pet is experiencing an emergency, please contact your local emergency veterinarian.

## **Opting Out of Marketing**

We may communicate promotions and exclusive offers to you sometimes via email. You may choose to opt-out using the link provided in the email, or by submitting a request via the ["Contact Us"](#) page on our Website. Please note that your opt-out is limited to the email address and device used and will not affect subsequent subscriptions or non-promotional communications such as those about your subscriptions, transactions, servicing or company's ongoing business relations.

Please allow sufficient time for your request to be processed. It may take up to 10 business days to process an email opt-out request, and 4-6 weeks for other requests.

## **Protecting Children**

Our Websites are not directed toward children under the age of 16. We do not knowingly collect or use Personal Information from children under 16. Regarding our software Services, none of the PetPlace software Products are intended to collect information from children. If you are a parent or legal guardian and believe your child has given us Personal Information without your consent, please contact us, and we will delete it.

## **California Notice at Collection**

PetPlace® is a trademarked brand owned by Independence Pet Holdings, Inc., (“PetPlace”), and its subsidiaries and affiliated brands including but not limited to ByteTag, 24Pet, 24PetConnect, Chameleon, PetPoint, 24PetShelter, 24PetRescue, 24PetWatch (collectively referred to as “Company,” “we,” “us” or “our”) and is committed to protecting your privacy, and the confidentiality and accuracy of your Personal Information.

This notice explains how we collect, use, retain, and disclose personal information related to California residents that are subject to the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA).

California consumers may be entitled to certain notices and disclosures regarding the collection, use, and sharing of their Personal Information, rights to access, correction, and deletion of certain Personal Information we collect about them, restricts us from “selling” or “sharing” certain Personal Information, and limit Our use of Sensitive Personal Information, as defined by the law and described in the categories below. These rights apply to all residents of California, regardless of whether you are a customer, Website visitor, business contact, or an employee. As a California resident, you have a right not to receive discriminatory treatment for exercising your privacy rights. None of the CCPA’s rights are absolute and are subject to legal and regulatory exceptions and exemptions. For more information about the CCPA, please <https://oag.ca.gov/privacy/ccpa>.

## **What is Personal Information?**

Under the CCPA, “Personal Information” is information that identifies, relates to, or could reasonably be linked with a particular consumer or household. We collect Personal Information relating to California users in a variety of contexts. The specific Personal Information that we collect, use, disclose, sell or share depends on our relationship or interaction with that individual.

## **Categories of Third Parties to Whom We Disclose Personal Information**

- Our subsidiaries and affiliates for the purposes of management, analysis, or other business purposes.
- Service Providers and Contractors we use to support our business, for example, legal service, marketing or other creative or promotional agencies, information technology services and products, cloud-based services, web hosting, Service Providers or Contractors.
- Third-Party Marketing or Third-Party Data Analytics Providers.
- Advertising Networks for cross-context advertising purposes
- Internet service providers
- Regulatory bodies, as required by law, comply with legal obligation or to protect our rights and interests.

## **Sale, Sharing, and Other Disclosures of Personal Information**

Any category of personal information listed in the chart below may be shared for a business purpose with service providers and contractors, which are companies that we engage to conduct activities on our behalf. Service providers and contractors are restricted from using personal information for any purpose not related to our engagement.

California law requires us to provide you with information regarding the parties to whom we “sell” or “share” your information, and the parties to whom we disclose your information for a business or commercial purpose. A business “sells” personal information when it discloses Personal Information to another business or a third party for monetary or other valuable considerations.

Under CCPA, allowing certain third parties to collect Personal Information via automated technologies on our Website for cross-context behavioral advertising purposes is considered the “sharing” of your Personal Information. We do not have actual knowledge that we sell or share the Personal Information of minors under 16 years of age.

Our Company shares or sells the categories of personal information listed in the chart below for advertising and analytics with social media platforms, ad networks, Third-Party data analytics, and Third-Party marketing partners.

If you would like to opt out of the share or sale of your information for advertising and marketing purposes, please see our “[How May I Make A Request](#)” section of this policy. At no point will we share your phone number with third parties for the purpose of automated dialing or SMS-based marketing without your explicit consent. You can manage your preferences through the cookie widget or the “Do Not Sell or Share My Personal Information” link on our Website.

If you would like to opt out of cookies for the purpose of analytics or personalization, you can manage your preferences through the cookie widget on our Website.

We process opt-out preference signals, such as the Global Privacy Control, as required by the CCPA. These signals set the opt-out of sale and sharing preferences for the particular browser or device you are using. For information about how to use Global Privacy Control, please visit <https://globalprivacycontrol.org/>.

We may also disclose aggregated, anonymous information to any other company. This information is not linked to personal information that can identify you. In addition to the business purpose identified above, we may use and may have used during the 12-month period to the last updated date in connection with a corporate transaction and due diligence activities for a potential or actual transaction between our business and another business, such as a proposed or actual merger, acquisition or divestiture. We may be required to disclose your personal information and non-personal information pursuant to a government subpoena, warrants, or orders.

The following charts detail our practices regarding the collection, use, and retention of your Personal Information within the 12 months preceding the date this notice was last updated. We may collect personal information and sensitive information listed in the categories. The tables also list, for each category, our expected retention period, use purposes, and whether we sell the information or share it with third parties for cross-context behavioral advertising.

<b>Personal Information Category</b>	<b>Retention Period</b>	<b>Business Purpose</b>	<b>Sold or Shared for Cross-Context</b>
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			<b>Behavioral Advertising</b>
<p>Personal Identifiers: Name, email address, phone number, age, address, username and basic account information, unique identifiers, IP Address (such as those assigned in cookies).</p>	<p>We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law.</p>	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Processing and fulfilling orders</li> <li>• Affiliates to offer products and services you request based on your consent</li> <li>• Maintaining and servicing accounts.</li> <li>• Marketing and Advertising</li> <li>• Third Party Marketing</li> <li>• Delivery of products</li> <li>• Third Party Data Analytics</li> <li>• Fraud Detection and Prevention</li> <li>• Research and development</li> <li>• Compliance and legal obligations</li> </ul>	<p>Sold and Shared</p>
<p>Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e)): Name, email address, address, telephone number.</p>	<p>We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law.</p>	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Delivery of products</li> <li>• Marketing and Advertising</li> <li>• Data Analytics</li> <li>• Payment processing</li> <li>• Fraud Detection and Prevention</li> <li>• Compliance and legal obligations</li> </ul>	<p>Sold but not Shared</p>
<p>Personal Information categories listed in</p>	<p>We may retain your Personal Information</p>	<ul style="list-style-type: none"> <li>• Provide products and services</li> </ul>	<p>Not Sold or Shared</p>

<p>the California Customer Records statutes (Cal. Civ. Code 1798.80(e)): Driver's license number, insurance policy number, bank account number, credit card number, debit card number, or any other financial information.</p>	<p>for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law.</p>	<ul style="list-style-type: none"> <li>• Delivery of products</li> <li>• Data Analytics</li> <li>• Payment processing</li> <li>• Fraud Detection and Prevention</li> <li>• Compliance and legal obligations</li> </ul>	
<p>Protected classification characteristics under California or federal law: Sex to include Gender or Gender Identity, or military status.</p>	<p>We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law.</p>	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Delivery of products</li> <li>• Compliance and legal obligations</li> </ul>	<p>Not Sold or Shared</p>
<p>Commercial Information: Includes records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>Not Collected.</p>	<p>Not Collected</p>	<p>Not Sold or Shared</p>
<p>Biometric Information</p>	<p>Not Collected</p>	<p>Not Collected</p>	<p>Not Sold or Shared</p>
<p>Internet or other electronic activity information, including but not limited to, browsing history,</p>	<p>We may retain your Personal Information for the period necessary to fulfill the purposes described</p>	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Affiliates to offer products and</li> </ul>	<p>Sold and Shared</p>

search history, and information regarding a consumer's interaction with an internet website application, or advertisement, including unique identifiers, cookie or tracking pixel information, device ID, search history, or interaction with an advertisement.	in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law.	services you request based on your consent. <ul style="list-style-type: none"> <li>• Marketing and Advertising</li> <li>• Perform data analytics</li> <li>• Fraud detection and prevention</li> <li>• Compliance and legal obligations</li> </ul>	
Geolocation data	We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law.	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Marketing and Advertising</li> <li>• Compliance and legal obligations</li> </ul>	Sold or Shared
Professional or employment related	Not Collected	Not Collected	Not Sold or Shared
Education information	Not Collected	Not Collected	Not Sold or Shared
Audio, electronic, visual, thermal, olfactory, or similar information	We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Fraud Detection and Prevention</li> <li>• Compliance and legal obligations</li> </ul>	Not Sold or Shared

	otherwise permitted by law.		
Inferences drawn from other Personal Information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	We may retain your Personal Information for the period necessary to fulfill the purposes described in our privacy policies or any notice provided at the time of collection, in accordance with our legal obligations, our records retention policies, or as otherwise permitted by law.	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Marketing and Advertising</li> <li>• Perform data analytics</li> <li>• Fraud Detection and Prevention</li> <li>• Compliance and legal obligations</li> </ul>	Sold and Shared

Sensitive personal information is a subtype of personal information consisting of specific information categories. We may collect and use information that falls within the sensitive personal information categories below. For more information about the use of such information, please see the defined Business Purpose for every category.

<b>Sensitive Personal Information Category</b>	<b>Retention Period</b>	<b>Business Purpose</b>	<b>Sold or Shared for Cross-Context Behavioral Advertising</b>
Government identifiers, such as your Social Security number, driver's license, state identification card, passport and visa information, or immigration status and documentation.	We retain personal information for a time reasonably necessary to achieve the purposes unless a longer retention period is required or permitted by applicable law.	<ul style="list-style-type: none"> <li>• Provide products and services</li> <li>• Marketing and Advertising</li> <li>• Perform data analytics</li> <li>• Fraud Detection and Prevention</li> </ul>	Not Sold or Shared
Complete account access credentials, such as usernames, account numbers, or card numbers	Not Collected	Not Collected	Not Sold or Shared

combined with required access/security code or password.			
Precise geolocation	We retain personal information for a time reasonably necessary to achieve the purposes unless a longer retention period is required or permitted by applicable law.	<ul style="list-style-type: none"> <li>• Provide products and services based on your consent.</li> <li>• Compliance and legal obligations</li> </ul>	Not Sold or Shared
Racial or ethnic origin.	Not collected	Not Collected	Not Sold or Shared
Citizenship or immigration information.	Not collected	Not Collected	Not Sold or Shared
Religious or philosophical beliefs.	Not Collected	Not Collected	Not Sold or Shared
Union membership.	Not Collected	Not Collected	Not Sold or Shared
Mail, email, or text messages contents not directed to the Company.	Not collected	Not Collected	Not Sold or Shared
Genetic data.	Not Collected	Not Collected	Not Sold or Shared
Neural data, which is information generated by measuring a consumer's central or peripheral nervous system activity that is not inferred from nonneural information.	Not Collected	Not Collected	Not Sold or Shared
Unique identifying biometric information.	Not Collected	Not Collected	Not Sold or Shared
Health information, including job	Not Collected	Not Collected	Not Sold or Shared

restrictions and workplace illness and injury information.			
Sex life or sexual orientation information.	Not collected	Not Collected	Not Sold or Shared

## Your Privacy Rights

PetPlace makes available its Products and Services to the general public and will respond to individual Privacy Rights requests submitted by our customers. In some cases, PetPlace also acts as a software or platform service provider to our Customers and the data in our systems is owned by those Customers, meaning, those Customers have jurisdiction over the data and any end-user data subject request should be submitted directly to that Customer.

- **Right to Know.** You can request that we disclose to you: (i) the categories and/or specific pieces of Personal Information we have collected about you (see the “[What Personal Information Do We Collect](#)” section), (ii) the categories of sources for that Personal Information (see the “[How We Collect Personal Information](#)” section), (iii) the purposes for which we will use that information, (iv) the categories of any third parties with whom we may disclose that information, and (v) the categories of information that we may disclose to any third parties. We will provide you with this information for the 12-month period preceding your request. You can make a request to know twice a year.
- **Right to Deletion.** You can request that we delete your Personal Information and ask our service providers to do the same. We will honor the request to delete unless one of the following exceptions applies:
  - **Transactional:** information necessary to complete a transaction or contract for which it was collected.
  - **Security:** to detect, prevent, or investigate security incidents.
  - **Error Correction:** to identify and repair any errors or bugs.
    - **Non-identifying information:** To help diagnose problems and administer our Website, information such as your browser type, and operating system may be gathered, but do not identify any individual.
  - **Legal:** to comply with applicable laws or legal obligations, to protect against fraud or illegal activity, or to ensure the right of a consumer to exercise rights, such as free speech rights.
  - **Internal Use:** to use in a lawful manner that is aligned with the expectations of the consumer and the context in which the consumer provided the information (i.e., improve our services).
- **Right to Opt-Out of Sale or Sharing.** You may opt out of us sharing your information by submitting a request.
  - We process opt-out preference signals, such as the Global Privacy Control, as required by the CCPA. These signals set the opt-out of sale and sharing preferences for the particular browser or device you are using. For information about how to use Global Privacy Control, please visit <https://globalprivacycontrol.org/>.
  - You can manage your preferences through the cookie widget or the “Do Not Sell or Share My Personal Information” link on our Website.
  - Submit a request through the “[How May I Make a Request](#)” link below.

- **Right to Nondiscrimination.** We will not discriminate against you, and we will not charge you a different price or provide a different level of service for exercising your CCPA rights. We will not discriminate against you for exercising any of your CCPA rights and we will not deny you goods or services, charge you a different price, or provide you with a lower quality of goods or services if you exercise any of your CCPA Rights.
- **Right to Correct Inaccurate Personal Information.** You can request correction of any inaccurate Personal Information we have about you.
- **Right to Limit.** Upon your direction, we will limit the use and disclosure of sensitive Personal Information collected about you, such as only using this information to provide you with the services you requested.

### **California Privacy Rights Act Non-Discrimination Disclosure**

We will not discriminate against you, and we will not charge you a different price or provide a different level of service for exercising your rights. We will not discriminate against you for exercising any of your rights and we will not deny you goods or services, charge you a different price, or provide you with a lower quality of goods or services if you exercise any of your Rights.

### **California Privacy Rights Act Retention Disclosure**

We keep your information for as long as it is required to fulfill the products or services relevant to the “Identified Purposes” as defined in this Privacy Policy, as permitted or as required by law, or otherwise communicated to you.

### **Your California Privacy Rights**

California’s “Shine the Light” law permits customers in California to request certain details about how certain types of their information are shared with third parties for those third parties’ own direct marketing purposes. If you are a California resident, you may opt-out of such sharing by emailing us at [privacy@ipgpet.com](mailto:privacy@ipgpet.com) or mailing a written request to the address under the “[How May I Make A Request](#)” section below.

### **Additional State Privacy Disclosures**

State consumer privacy laws may provide their residents with additional rights regarding our use of their Personal Information. The exact scope of these rights may vary by state. To exercise any of these rights, see the “[How I May Make a Request](#)” section below. PetPlace will utilize commercially reasonable security and confidentiality measures to secure maintain Personal Information, including but not limited to compliance with applicable data privacy laws, rules, and regulations, which protect the privacy rights of individuals submitting information to PetPlace, including without limitation state and federal laws in the United States, such as the California Consumer Privacy Act, as amended by the California Privacy Rights Act, Colorado Privacy Act, Connecticut Act Concerning Personal Data, Delaware Personal Data Privacy Act, Iowa Consumer Data Privacy Act, Maryland Online Data Privacy Act, Minnesota Consumer Data Privacy Act, Montana Consumer Data Privacy Act, Nebraska Data Privacy Act, New Hampshire Privacy Act, New Jersey Data Privacy Act, Oregon Consumer Privacy Act, Texas Data Privacy and Security Act, Virginia Consumer Data Protection Act, and the Utah Consumer Privacy Act.

### **Additional Privacy Rights**

PetPlace makes available its Products and Services to the general public and will respond to individual Privacy Rights requests submitted by our Customers. In some cases, PetPlace also

acts as a software or platform service provider to our Customers and the data in our systems is owned by those Customers, meaning, those Customers have jurisdiction over the data and any end-user data subject request should be submitted directly to that Customer.

If you reside in a U.S. state or other region that has enacted a comprehensive consumer data privacy law, you may have one or more of the following rights listed below. We will honor requests received only to the extent required by applicable law and within the time provided by law. We will not discriminate against any individual who submits a request through our Privacy Rights request process defined below:

- Request access to categories and specific pieces of personal information about you.
- Request that we correct inaccurate or incomplete personal information about you.
- Request deletion of personal information about you unless one of the following exemptions applies:
  - Transactional: information necessary to complete a transaction or contract for which it was collected.
  - Security: to detect, prevent, or investigate security incidents.
  - Error Correction: to identify and repair any errors or bugs.
    - Non-identifying information: To help diagnose problems and administer our site, information such as your browser type, and operating system may be gathered, but do not identify any individual.
  - Legal: to comply with applicable laws or legal obligations, to protect against fraud or illegal activity, or to ensure the right of a consumer to exercise rights, such as free speech rights.
  - Internal Use: to use in a lawful manner that is aligned with the expectations of the consumer and the context in which the consumer provided the information (i.e., improve our services).
- Request restrictions, temporarily or permanently, on our processing of some or all personal information about you;
- Request transfer of personal information to you or a third party where we process the data based on your consent or a contract with you, and where our processing is automated; and
- Opt-out or object to our use of personal information about you where either:
  - Our use is based on your consent or our legitimate interests, or
  - You do not want us to share with third parties.

### **Colorado Privacy Act Profiling Disclosure**

PetPlace does not engage in profiling of consumers in furtherance of automated decisions that produce legal or similarly significant effects, as those terms are defined under the Colorado Privacy Act.

### **Minnesota Consumer Data Privacy Act Retention Disclosure**

We keep your information for as long as it is required to fulfill the products or services relevant to the “Identified Purposes” as defined in this Privacy Policy, as permitted or as required by law, or otherwise communicated to you.

### **New Jersey Notice of Material Change Disclosure**

If we make material changes to our Privacy Policy, we will provide affected customers with advance notice of the change, such as by email.

## **Oregon Consumer Privacy Act Profiling Disclosure**

PetPlace does not engage in profiling of consumers in furtherance of automated decisions that produce legal or similarly significant effects, as those terms are defined under the Oregon Consumer Privacy Act.

## **Oregon Consumer Privacy Act Controller Entity Disclosure**

The controller entities that are subject to the PetPlace Privacy Policy and this disclosure include Independence Pet Holdings, Inc.

## **Canada Privacy Rights**

Personal data (as the term is defined in the Personal Data Protection and Electronic Documents Act of Canada (“PIPEDA”)) may be collected, stored, used and/or processed by PetPlace in accordance with this Privacy Policy and PetPlace obligations under PIPEDA and other applicable Canadian provincial laws. Pursuant to Canadian law, you have a right to request access to your personal information and to request that inaccurate personal information be corrected. If you have submitted personal information to us and would like to have access to it, or have it corrected, please contact us in accordance with the “[How May I Make A Request](#)” section listed below. When requesting access to, or correction of, your personal information, we will require that you verify our request via email and request specific data from you to enable us to confirm the authenticity of the request and your identity, and to enable us to search our records and databases. To delete your name from our electronic contact lists (text or email), please follow the applicable opt-out instructions included in each SMS/Text Marketing communication or contact us in accordance with the “[How May I Make A Request](#)” section listed below. For more information about the Office of the Privacy Commissioner of Canada, please access [its website](#).

Access to your information is limited to employees and contractors who need access to perform their duties. All personnel authorized to have access to personal information must keep the information confidential. Our service providers and agents are required to maintain client confidentiality and may not use the information for any unauthorized purposes. Employees are governed by strict standards and policies to ensure personal information is secure and treated with the utmost care and respect.

We adhere to privacy principles including accountability, identifying purposes, consent, limiting collection, limiting use, disclosure, and retention, accuracy, safeguards, openness, individual access, and handling enquiries and complaints. We respect all personal information under our control. We have designated a Privacy Officer accountable to Senior Management for our compliance with this Privacy Policy. If you have a complaint regarding our compliance with our Privacy Policy or procedures, please contact our Privacy Officer at [privacy@jpppet.com](mailto:privacy@jpppet.com).

## **Droits à la vie privée au Canada**

Une copie de cette politique de confidentialité est disponible en Français à ce [lien](#).

## **Cross Border Transfers of Data**

PetPlace headquarters are in the United States and as such, data may be transferred to the United States from the European Economic Area (“EEA”), Switzerland, or another country that requires legal protections for international data transfer. Personal data will be transferred to the

United States, Canada, or another country in which PetPlace operates business (in certain scenarios, India and/or Brazil): to fulfill contractual obligations to you; with your consent; or to fulfill a compelling legitimate interest of PetPlace in a manner that does not infringe upon your rights and freedoms. We make every effort to ensure the security and protection of the data we transfer.

We are committed to protecting the privacy of personal data and adherence to Global Data Protection laws. PetPlace implements Standard Contractual Clauses to govern the international transfer of data.

For EEA residents, you can find the contact details for your local data protection authority here [https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en).

### **Australia Privacy Rights**

The personal information collected, stored, used, and/or processed by PetPlace, as described in this Privacy Policy, is collected, stored, used and/or processed in accordance with the Australian Privacy Act 1988 (Commonwealth), as amended, and the Australia Privacy Principles (“APPs”). Further information regarding the APPs is set out on the Australian Government website [www.oaic.gov.au](http://www.oaic.gov.au). If you would like to update or access your personal information held by PetPlace, please contact us in accordance with the “[How May I Make a Request](#)” section listed below. If you believe that the personal information that we hold about you is incorrect, incomplete, or inaccurate, then you may request we amend it and you may submit such a request by contacting us in accordance with the “[How May I Make A Request](#)” section listed below.

Please notify us of any complaint you may have about our handling of your personal information by contacting us in accordance with the “[How May I Make A Request](#)” section listed below, and please set forth the details of your complaint. We will undertake commercially reasonable efforts to reply to your complaint within thirty (30) days and will, where necessary or appropriate, advise you of the general reasons with respect to how we responded to your complaint. Notwithstanding the foregoing, you may submit a complaint at any time to the Office of the Australian Information Commissioner.

### **How May I Make a Request?**

You may make a request using one of the methods below:

- Submit a [Data Subject Request](#)
- Send a request via mail to:

Attn: Privacy Officer  
PetPlace  
11333 North Scottsdale Road, Suite 160  
Scottsdale, AZ 85254

### **What Do I Need to Provide When Making a Request?**

To verify your identity when you are making a request, you may need to provide the following information if applicable:

- Name
- Telephone Number
- Mailing Address
- Email Address

We will match this information to the information in our systems and under certain circumstances may request additional information via email or telephone to ensure we are interacting with the correct individual. We will maintain a record of your request.

Please be aware that we do not accept or process requests through other means (e.g., via fax, chats, social media, etc.)

### **May I Use an Authorized Agent?**

If you wish to designate an authorized agent to act on your behalf, you must provide the authorized agent with written permission to do so, and your authorized agent must submit that written proof at the time they make the request on your behalf.

### **Privacy Request Verification Process**

If you (or your authorized agent) make any request related to your personal information, PetPlace will ascertain your identity (and the identity of the authorized agent, to the extent applicable) to the degree of certainty required or permitted under the law before addressing your request. PetPlace will, to the extent required or permitted by law, require you (or your authorized agent) to verify your request via email or other means and match at least four pieces of personal information we have previously collected from you before granting you access to, or erasing, specific pieces or categories of personal information, or otherwise responding to your request. We may require written documentation which demonstrates that a third party is authorized to serve as your agent for the purposes of submitting the requests set forth herein, unless you have provided the authorized agent with power of attorney.

### **May I Make Multiple Requests?**

If you wish to make multiple requests under this section you may do so, however we process requests in the order they are received, so we recommend sending the deletion request last, as we will not be able to fulfill your other requests once we have deleted your information.

### **How Long Will It Take to Process My Request?**

For verifiable consumer requests related to opting out of the sharing of data, we will respond within the legal requirements to your request, depending on the requirements of your jurisdiction.

For all other requests, we will respond to a verifiable consumer request within forty-five (45) calendar days of receipt. If necessary, we may require an additional forty-five (45) calendar days, at which point we will inform you of the reason and extension period in writing. We will provide an explanation in the event we are unable to process a request in whole or in part.

### **Changes to Our Privacy Policy**

If we decide to make any changes to our privacy policy, those changes will go into effect on the effective date posted in the notice at the top of the revised privacy policy. The most current version of the privacy policy will apply to all current and past visitors to our Websites and will replace any prior policies that are inconsistent. Your continued use of our Websites and other services constitutes your acceptance of the practices described in the most current privacy policy.

### **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us:

Email: [privacy@ipgpet.com](mailto:privacy@ipgpet.com)