Oneida One Stop Privacy Policy

Our Commitment to Privacy

Your privacy is important to us. To better protect and inform you, we provide this notice explaining our online information practices and the choices you can make about the information collected and used on our main website, Oneida One Stops (the "Site"), rewards website, https://oneidansn.gov/oneidaonestop/ (the "Rewards Site"), mobile app (the "Mobile App") and other electronic services we provide. To make this notice easy to find, we make it available on our homepage and at every point where we may request personally identifiable information ("PII"). By using any services explained here and accessing our Site, Rewards Site and Mobile App, you consent to the collection and use of information described here. We reserve the right to alter this privacy notice at any time.

The Information We Collect

This notice applies to all information collected or submitted on the Site, Rewards Site and Mobile App or other electronic requests and services. Personal Information collected may include, but not limited to, name, address, email address, birthdate, and phone number. We may also collect information about purchases such as transaction data and purchase history as well as about your use of the Site, Rewards Site and Mobile App. The exact information collected may vary with the services you use.

We use email addresses, phone number and other information collected through the Site, Rewards

The Way/How We Use Information

Site and Mobile App or other communications to address and answer customer inquiries and issues brought to our attention. We frequently use internal identifiers to reduce the amount of personal information required for the completion of transaction and communication activities. When you register via the Site, Rewards Site and Mobile App, you consent to receiving email marketing messages and other electronic requests (such as survey participation) and may opt in to receive text and push marketing messages. You may unsubscribe from these marketing messages at any time. We do not share your information with third parties for direct marketing purposes. We periodically distribute newsletters through postal mail. This may include providing the postal service with a list of physical mailing addresses for specific mailings and newsletters to provide our customers with the most relevant information. For customers receiving postal mailings, physical mailing addresses may also be shared with National Change of Address (NCOA) services for address verification and improved delivery rates.

We use non-identifying data and aggregate information to better design our Site, Rewards Site and Mobile App as well as to provide value to customers who have registered through them. Some data points may include website pages visited, page hits and form-submission events. Such information may be used to target marketing messages and offers on all platforms, coordinate and/or administer sweepstakes and for other internal analysis and promotions. You may request to delete your rewards account at any time.

We may use your personal information for processing transactions and user activity through (i) the Site as in the case of the Rewards Site or Mobile App and in conjunction with company and Paytronix third-party software and administrative systems.

We may use personal information internally, or share upon customer request, for certain customer service and/or Oneida Retail Enterprise store-related inquiries. Examples of these use cases include locating the owner of a rewards card left behind at a store, facilitating transaction processing, loss prevention and theft investigations, and responding to personal inquiries regarding rewards earning/redeeming or past transactions associated with your rewards account.

Cookie Use

Cookies allow us to better manage and deliver services to our customers. They allow us to remember you and your preferences on future visits. Cookies help us to do this by storing certain information on your device. A cookie is a file downloaded to your device that stores data. The party responsible for its installation can update or retrieve the data stored. There are several categories of cookies: functional, analytics, and advertising cookies. For more information on cookies and how to control your preferences, please visit: https://www.allaboutcookies.org/.

We may use cookies, pixel tags, advertising identifiers, and other technologies through the Rewards Site and Mobile App to better manage and deliver our services to customers. These technologies may involve collaboration with our limited set of advertising and data analytics third parties, as well as cookie tracking for login events to our Site and Mobile App. The Rewards Site and Mobile App collect and transmit identifiers, including the Google Android advertising identifier and the Apple IDFA advertising identifier. These provide use with the ability to better manage and track activity in the Mobile App version available through Google Play

Types of Cookies

Functional cookies: These cookies are necessary to ensure the functionality of the site or mobile application. They allow you to browse and use the site and application as well as to use any of the options or services within. These cookies do not gather personal information for marketing, nor do they remember anywhere else you have been on the internet. They are solely intended to help the site or application run.

Analytics cookies: These cookies allow for the tracking and analytics of user behavior. They help the party responsible for them make improvements based on the data collected. This information is usually in the aggregate form. Oneida One Stop uses some third party cookies. We use Google Analytics to help use track user metrics across our site. This information is collected and shared in the aggregate. For more information on how Google may use this information, please visit: https://policies.google.com/privacy?hl=en-US. We also use WooCommerce (WordPress) to manage our site. For more information on the WooCommerce (WordPress) privacy policy, please see: https://automattic.com/privacy/.

Advertising cookies: These cookies store information about a user's behavior such as browsing habits and present the user with relevant ads.

Information Sharing

Oneida One Stop does not share any cookie information obtained with any third parties and does not sell any personal information.

Managing Your Preferences

You may wish to change your browser settings to reject some or all cookies. Some features or services of the Website or Application may not work properly without cookies. You can find

information about managing cookie preferences in your browser settings or at:

https://www.allaboutcookies.org/. Please see links below for information about specific browsers:

Chrome

Firefox

<u>Safari</u>

<u>Internet Explorer</u>

The Mobile App includes location-based services to assist customers with finding a local store with city-level granularity. The Mobile App and Site do not use location-based services for other purposes, such as location-based advertisements. Similarly, the Site and Rewards Site may use third-party analytics to associate a website visitor's IP address with city-level granularity. We do not sell your personal information. Information collected may be shared with administrators, third-party developers and hosting sites, vendor partners and other organizations on an as-needed basis. Third-party collection agencies may be engaged and require information sharing specific to relevant Oneida One Stop Card accounts. In case of acquisition, merger, reorganization or sale, we may share your information with relevant third-parties. In such cases, we take reasonable measures to limit sharing and ensure your information remains confidential. We may disclose personal information, at the request of law enforcement and as required by law, subject to review and approval by the Oneida Nation's Legal Department. Notifications may include information sharing with consumer reporting agencies, pending any law enforcement investigation.

Third Party Ad Services

Users of the Oneida One Stop app may access a feature which allows third party ad services to display advertisements in exchange for a chance at earning extra visits. These third party ad services may collect data using their own tools (Software Development Kits or "SDK") when a member uses this feature. Third party ad services do not receive data from members who choose not to participate in this feature.

Social Media and Survey Technology

We regularly engage with our customers through social media platforms, external to our Site, Rewards Site and Mobile App, including Facebook, Instagram, Snapchat, Twitter and YouTube. We also use third-party tools to follow-up and communicate with customers across multiple social media platforms. Private messages on Facebook and Twitter (Direct Message or DM) may also be used to receive information from customers such as name, email address, phone number and/or date of birth. We may leverage social media technology and tools to customize advertisements and communications for specific customers or groups.

We may use third-party survey platforms to reach out to customers. To facilitate the survey process, the following information is used to accurately reach specific customers and collect their feedback: first name, last name, email address, rewards number and a unique identifier. The data set is purged from the survey platform upon completion of the survey.

Our Commitment to Data Security

To prevent unauthorized access, maintain data accuracy and ensure the correct use of information, we have put in place appropriate physical, electronic and procedural safeguards to secure the

information we collect online. We limit access to information about you to authorized employees and agents that need to know it in order to provide the relevant Oneida One Stop products and services.

Our Commitment to Children's Privacy

Protecting the privacy of the very young is especially important. Our Site is not intended to collect information about individuals known to be under the age of 13. Individuals under the age of 13 should not access our Site. If a child under the age of 13 provided personal information to our Site, a parent or legal guardian should contact us using our <u>Contact Us</u> page.

Sweepstakes are further restricted, per the official rules documented in the sweepstakes, including a minimum limit of 18 years of age.

How to Access or Correct Your Information

You can obtain or request removal of your personally identifiable information that we collect online and maintain by contacting us through the <u>Contact Us</u> page. This procedure is designed to safeguard your information.

You can correct factual errors in your PII by sending us a request that credibly shows error.

How to Contact Us

Should you have other questions or concerns about these privacy policies, please send us an email at Contact Us