

## PRIVACY POLICY

Your privacy is important to us at Pivot Rock Services LLC (“Company,” “we,” “us,” or “our”), and we are committed to safeguarding, preserving, and respecting your privacy rights. If you are a California resident, you have certain rights with respect to the collection, use, transfer, and processing of your personal information, as defined by the California Consumer Privacy Act (“CCPA”), Cal. Civ. Code § 1798.100 et seq., as amended by the California Privacy Rights Act (“CRPA”) and implementing regulations.

This Privacy Policy (“Policy”) describes how we collect, use, share, disclose, retain, and secure the personal information we gather about you through our website <https://pivotrocksolutions.com/> (the “Site”). We reserve the right to limit these rights where permitted under applicable law, including where your identity cannot be reasonably verified or to the extent your rights adversely affect the rights and freedoms of others

### What Information Do We Collect?

In the previous 12 months, we have collected the following categories of personal information from the Pivot Rock website.

Category 1	Examples	Collected	Retention Period
A. Identifiers	A real name, alias, postal address, online identifier, Internet Protocol address, email address, or other similar identifiers.	Yes	5 years
B. Personal Information	A name, address, or telephone number. Some personal information included in this category may overlap with other categories	Yes	5 years
C. Protected Classification Characteristics Under California or Federal Law	Age, sex (including gender, gender identity, gender expression), veteran or military status.	No	N/A
D. Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	No	N/A
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	No	N/A
F. Internet or Other Similar Network Activity	Search history, information on interaction with a website.	No	N/A
G. Geolocation Data	Physical location or movements.	No	N/A
H. Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information.	No	N/A
I. Professional or Employment-Related Information	Current or past job history or performance evaluations.	No	N/A
J. Non-Public Education Information	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	N/A

K. Inferences Drawn of the Consumer	Inferences drawn from Personal Information identified above to create a profile about a consumer reflecting a consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No	N/A
L. Sensitive Personal Information	Personal information that reveals (a) Social Security, driver’s license, state identification card, or passport number; (b) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credential allowing access to an account; (c) precise geolocation; or (d) the contents of a consumer’s mail, email, and text messages unless the business is the intended recipient of the communication.	No	N/A

Sources from Which Personal Information Is Collected

We collect your personal information directly from you, from your interaction with the Site, and from publicly available sources, which collect the personal information directly from you. We may collect information from—or share information with—our partners such as our affiliates, subsidiaries, joint ventures, or other companies under common control. We may combine that information with other information we collect about you. Furthermore, all information gathered about you by the Company may be shared with any of the Company’s current or future subsidiaries or affiliates.

Business or Commercial Purposes for Which Personal Information Is Collected

Your personal information is used for the following purposes:

- To present our website and its contents in a suitable and effective manner for you and your device;
- To contact you to provide you with information that you request from us;
- To measure the effectiveness of our website;
- To provide support, troubleshoot issues, and respond to requests, questions, or comments;
- To carry out our obligations and enforce our rights; and
- To notify you about any additions, upgrades, or changes on our website.

Third Parties with Whom Personal Information Is Disclosed, Shared, or Sold

In the preceding 12 months, we have disclosed the following personal information about consumers for business purposes:

- We may disclose personal information in categories A (identifiers), B (personal), and F (internet) with service providers.
- We disclose content posted on our social media platforms (e.g., if a consumer “comments” on a story) with other consumers. Such posts may include personal information in categories A and B, but the content depends on the individual posts.
- We disclose all of our information, including your Personal Information, with our subsidiaries and affiliates in connection with providing Services to you.

In the preceding 12 months, we have not shared personal information collected from this website for cross-contextual advertising.

Our use of cookies and other tracking technologies may be considered a sale of personal information under the CCPA. Categories of personal information that we have sold under the CCPA include identifiers (e.g., IP addresses), and Internet or other similar network activity. Categories of third parties to whom personal information is sold under the CCPA include data analytics providers.

In the preceding twelve (12) months, Pivot Rock Solutions, LLC has not knowingly collected, sold, or shared personal information of consumers under sixteen (16) years of age.

Individual Rights

a. Right of Deletion

You have the right to request that we and our service providers delete any personal information about you that we have collected from you upon receipt of a verifiable request. This right is subject to certain exceptions. We will state in our response if an exception applies.

#### b. Right to Opt-Out of the Sale or Sharing of Personal Information

You have the right to opt-out of the sale or sharing of your personal information by a business subject to certain laws and regulations.

We recognize the Global Privacy Control. Your browser must be able to support the Global Privacy Control for us to recognize your opt-out preference signal.

Please note that opt-out choices may be stored via cookies. If you clear cookies, if your browser blocks cookies, or if you view the page from a different browser or device, your opt-out choice may no longer be logged or recognized.

You have the right not to receive discriminatory treatment for exercising the privacy rights conferred by California law. We will not discriminate against you because you exercised any of your privacy rights. We will also not retaliate against any employee, applicant for employment, or independent contractor for exercising their rights under the CCPA.

#### c. Right of Correction

If we maintain inaccurate personal information about you, then you have the right to request that we correct the inaccurate personal information upon receipt of a verifiable request. Taking into account the nature of the personal information and purposes of processing the personal information, you have the right to request that we correct inaccurate personal information about you, if applicable.

#### d. Right to Limit Use and Disclosure of Sensitive Personal Information

We do not collect Sensitive Personal Information (as defined in Cal. Civ. Code § 1798.140(ae)) about you from this website for the purpose of inferring characteristics about you.

Please refer to the California Privacy Policies posted on each of our affiliate / brands websites for information on how we may use Sensitive Personal Information in providing Services to our customers and how to exercise the Right to Limit Use and Disclosure of Sensitive Personal Information.

#### e. Submitting Requests

You can submit your request by contacting us at: email: [notices@pivotrocksolutions.com](mailto:notices@pivotrocksolutions.com) in person or by mail: 3605 S Tamarac Drive Suite 200 Denver, CO 80237 and via phone at 855) 789-7988.

#### f. Verifying Requests

To ensure the protection of your personal information, we must verify that the individual submitting a request to know, request to delete, or request to correct is the consumer to whom the request relates prior to processing the request. To verify a consumer's identity, we may request up to three pieces of personal information about you when you make a request to compare against our records. We may also request that you sign a declaration under the penalty of perjury from the consumer whose personal information is the subject of the request.

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

We will only use personal information provided in your request to verify your identity and will delete any information you provide after processing the request. We reserve the right to take additional steps as necessary to verify the identity of consumers where we have reason to believe a request is fraudulent.

#### Contact Us

If you have any questions about this Privacy Policy, please contact us at email: [notices@pivotrocksolutions.com](mailto:notices@pivotrocksolutions.com) , in person or by mail: 3605 S Tamarac Drive Suite 200 Denver, CO 80237 and/or by phone at 855) 789-7988