

Fast Stop Markets Privacy Policy **Effective August 30, 2021**

Message to Our Customers Regarding Privacy

Fast Stop Markets believes in protecting the confidentiality of our customers' personal information in accordance with our customers' wishes and applicable laws. Our reason for collecting customer information is to help us deliver added value and improve the shopping experience of our customers. The Fast Stop Perks Program ("Program") is our primary means of collecting such information which helps us to target benefits and services to our customers. This may include advising our customers about products, services, and other purchasing opportunities.

Fast Stop Markets values your business and the trust you place in us. To help you better understand how customers' personal information is used and protected at Fast Stop Markets and Highland, LLC., this Privacy Policy outlines (a) a definition of Personal Information, (b) methods and sources of collecting Personal Information, (c) categories of institutions or parties to whom we may disclose Personal Information, and (d) measures and efforts we take to safeguard Personal Information. Fast Stop Markets reserves the right to revise this Privacy Policy at any time without prior notice. For this reason, please check regularly for the most recent version of our privacy policy and its implications for you.

Specific Information about this Privacy Policy

The Policy is described here in a concise, transparent, intelligible, and easily-accessible form. It is set forth in a series of specific components describing how the Policy operates and how it meets certain privacy rights, especially those required under the California Consumer Privacy Act that became effective on January 1, 2020. Please be advised that **FAST STOP MARKETS DOES NOT SELL OR SHARE ANY PERSONAL INFORMATION WITH ANY THIRD PARTY.**

Definition of Personal Information

Personal Information is information about you and/or your household, as well as your mobile device (e.g., your name, birth date, address, email address, ISP, and telephone number), that is obtained by Fast Stop Markets in connection with providing a product or service for personal, family or household purposes. Your Fast Stop Perks account, including your account password (MIN), is also considered to be Personal Information.

We will collect and use your Personal Information, along with sales information or purchase data (Transaction Data), to calculate available benefits and deliver appropriate rewards and communications, as well as to help optimize your customer experience and enhance time spent at retail locations that participate in the Program. It is important to note that, in connection with its collection of Transaction Data, no payment information (credit card numbers, debit card numbers, bank account numbers) is ever collected or stored by Fast Stop Markets. Moreover, only after your Personal Information has been de-identified (i.e., made anonymous and/or aggregated), will it be used by Fast Stop Markets to develop trend data; accordingly, trend information is not Personal Information.

Methods and Sources of collecting Personal Information

To help better understand and serve the needs of our customers, we collect Personal Information from various sources, including the following:

- Information you provide us when you enroll in the Fast Stop Perks Program
- Information we receive when you use your Fast Stop Perks card at retail locations that are participating in the Program
- Information you give us on application forms, voluntary customer surveys, sweepstakes and coupon rebate entries, or when you visit our website
- Information you provide to us over the phone or through the mail or email
- Information we collect through your browser when you visit our website and your browser interacts with us

- Information provided to us by other sources/companies

How is Personal Information Used?

Fast Stop Markets uses your Personal Information to fulfill the Program services that you opt-in to receive by enrolling in the Program. These services can include: earning and redemption of rewards, receiving e-coupon or digital offers based on your purchases, and being eligible to participate in specific promotions and promotional events. If you have opted into our Program and provided us with an email address and/or a cell phone number, we may send you email messages, or mobile messages and/or coupons that may be related to your transactions. We may also send informational or promotional email or mobile messages to you, although you may opt out of receiving such communications at any time as described below, by contacting us at our website, or by calling Fast Stop Perks toll-free at 1-866-377-3757* Or you may click the “unsubscribe” button on any email or text message you receive, which will result in the removal of your opt-in approval to send you messages.

Fast Stop Markets will not sell or disclose to any company, person, or agency your “personal information.” Your Personal Information will only be used by Fast Stop Markets or its contractors/service providers, to fulfill its obligations to you under the Program. In those situations, Fast Stop Markets requires its contractors/service providers to sign an agreement that prohibits them from using your Personal Information outside of the contract services.

However, Fast Stop Markets may disclose to any company, person, or agency “Personal Information” as required by law, as required to protect the rights or safety of Fast Stop Markets or our customers, or in response to a specific law enforcement request. Security regulations of several countries may require us to provide foreign and domestic government agencies with access to data you disclose to us.

Fast Stop Markets may share anonymous and/or aggregated information (free of any Personal Information) about all our users with third parties. It is not possible for those third parties to determine who you are from such sanitized information.

What are your rights?

Regardless of where you reside, your rights in relation to your personal information are to: (1) be informed about its use by Fast Stop Markets; (2) have access to your information; (3) correct your personal information; (4) have your personal information deleted (see below); and (5) restrict how we use your personal information. A Fast Stop Perks Personal Identification Number (PIN) is required to access your account information and to make any request.

The right to have us delete your personal information carries an important caveat. If you ask us to delete your personal information, you will not be able to continue to participate in the Fast Stop Perks Program. We will respond within a reasonable time to any request from you to indicate your options if you still want to delete your personal information.

You also may have the right to have your personal information transferred to others businesses; however, because our use of your personal information is limited to fulfilling loyalty services on your behalf, it is usually not technically feasible for us to honor such a request because we are not able to exchange that information with another business with which we have no direct interface or where we have no existing business reason to exchange data (e.g., a different loyalty host is unlikely to honor Fast Stop Perks in its loyalty program). We will respond within a reasonable time to any request from you to export your personal information. You are also entitled to know if we are using any automated decision-making. As stated above, this is based on Transaction Data, which is not Personal Information, and is conducted to enable us to provide valuable offers to you.

Finally, you are also entitled to know if we are using biometrics as part of any identification of consumers using our Program. We do not employ any biometric technology in the identification of individual consumers.

Collection of Personal Information from Children

We do not knowingly collect information from children under the age of 13. If you have reason to believe that we collected or are in possession of personal information from someone under 13 years of age, please contact us at 1-866-377-3757. For individuals who are under the age of 18, we require that a parent or guardian handle the online enrollment in the Program.

Special Notice to California Residents

Fast Stop Perks customers who are California residents have the right under the California Consumer Privacy Act (“CCPA”), which became effective on January 1, 2020, to request the following information from a business that collects and uses your personal information to: (1) see what data companies collect on them; (2) request that it be deleted; (3) know what third-party companies their data has been sold to; and (4) direct a business to stop selling that information.

FAST STOP MARKETS DOES NOT SELL OR SHARE ANY PERSONAL INFORMATION WITH ANY THIRD PARTY.

Related to the CCPA “opt-out” provisions, Fast Stop Markets does not provide a “Do Not Sell” button on its website because a consumer who has not enrolled has no need to opt out, and Fast Stop Perks has provided an online procedure for an enrolled customer to withdraw from the Program, which operates the same way an “opt-out” button would terminate the individual’s participation.

If you desire to make a request under the CCPA, please contact us by email at perks@faststopmarkets.com, or call us toll-free at 1-866-377-3757. A Fast Stop Perks Personal Identification Number (PIN) is required to access your account or to identify yourself online. We will respond to such verified requests for information access within 45 calendar days following receipt at the email, unless we notify you that additional time will be required. Please note that we are only required to respond to each person once per calendar year.

Finally, in compliance with the CCPA, Fast Stop Markets provides customers with the following notice of its offering of a “financial incentive”:

- (1) Fast Stop Markets operates a customer appreciation program that enables individual consumers to enroll in the Fast Stop Perks Program (“Program”), shop at participating merchant locations, and earn points (worth \$.01 per point) that can be redeemed for discounts on future purchases. In addition, the Fast Stop Perks Program entitles enrolled customers to participate in giveaways and other promotions. There is no charge to a customer to join the Program.
- (2) A description of the Program’s material terms is found in this Policy as well as online at faststopperks.com, including a series of FAQs, including access to the personal information collected by Fast Stop Markets at enrollment.
- (3) An individual customer may “opt-in” to the Program by enrolling online, or by obtaining a loyalty card at a participating merchant location and registering the card online.
- (4) A customer who has enrolled in the Program may withdraw at any time by going online.
- (5) The Program is permitted under the CCPA, because it is not “unjust, unreasonable, coercive, or usurious in nature.” The Program does not discriminate against any consumer; it is available to anyone, but equally important, the same products and services are sold by participating merchants regardless of whether a consumer has enrolled in the Program. In further support of its position, Fast Stop Markets would show the following:
 - (a) A “good faith estimate” of the value of an enrolled customer’s personal information that forms the basis for the Program’s financial incentives is less than \$.01; and
 - (b) The method by which Fast Stop Markets has calculated the value of its use of an enrolled customer’s personal information is the use of “expenses related to the offer, provision, or imposition of any financial incentive or price or service difference,” which is one of the approved methods specifically identified by the Attorney General in its Proposed Regulations for implementing the CCPA.

NOTE: Customer participation in sweepstakes, giveaways, and other promotions sponsored by Fast Stop Markets is not covered by the term “financial incentive” under the CCPA. Such activities are benefits of membership in the Program, but have no implication on pricing of goods or services to customers, regardless of whether they provide personal information to Fast Stop Markets or not.

Retention of Personal Information

Fast Stop Markets may retain your personal information for as long as you have an account in the Program. If you notify us that you wish to withdraw from the Program, you have the choice to either retain the account, with any accrued points balance, in case you decide to re-active it in the future, or to delete the account, which will cancel any accrued point balance.

Use of Cookies

Our website uses cookies. Cookies are small data files generated by web servers and stored in your computer for future access. We use them for a variety of reasons, such as to study visitors' use of the site and to improve your navigation of it. If you continue to use one of our websites, we will require that you consent to the use of cookies (see below); however, you are free to delete our cookies. The majority of Web browsers accept cookies, but the "help" menu on your browser should give you options for preventing, accepting, or receiving notice of new cookies. You can configure your web-browser to disable cookies, but you should be aware that doing so may impair your use of our Website.

Security

Protecting your Personal Information is an important priority for Fast Stop Markets. Our internal employee Code of Ethics and this Privacy Policy emphasize this priority. Fast Stop Markets employees who violate our policies and procedures are subject to disciplinary action. Marketing services providers or affiliates that receive Personal Information are required to preserve the confidentiality of that information under the terms of our legal contracts with them. Fast Stop Markets also maintains physical, electronic and procedural safeguards in accordance with industry standards that are designed to keep unauthorized persons from accessing Personal Information stored on our systems.

Notice of Legitimate Interest

We are providing you with notice about the legitimate interest we have to collect and use your Personal Information without which we would not be able to fulfill the Program services for which you have accepted/opted in by enrolling in the Program. In some instances, we may also obtain affirmative consent from you to collect and use your personal information.

Will the Privacy Policy Change?

Fast Stop Markets may modify this Privacy Policy from time to time. Our current Privacy Policy can be viewed on our website at faststopmarkets.com. If you have any questions regarding this Privacy Policy or wish to change your personal Customer Information preferences, please contact us toll-free at 1-866-377-3757 or through our website. A Fast Stop Perks Personal Identification Number (PIN) is required for account information.

Recognition of Other Legitimate Interest/Affirmative Consent

I have read the above information presented by Fast Stop Markets about its Privacy Policy. I hereby recognize and acknowledge that Fast Stop Markets through this Policy and its Website Terms of Use, have fully disclosed and provided me with information about its legitimate interest in collecting and using my personal information in order to fulfill my underlying contract for Program services. In addition, in some situations, I may be able to give affirmative consent to Fast Stop Markets to collect and use my personal information. I am aware that I have the right to seek to withdraw from the Program at any time, by contacting Fast Stop Perks at 1-866-377-3757, or online.