

CCPA Consumer Legacy FAQs





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1. What is CCPA?

The California Consumer Protection Act broadly grants new rights to California consumers:

- The right to know what personal information is collected, used, shared or sold
- The right to delete personal information held by businesses
- The right to opt-out of sale of personal information
- The right to non-discrimination in terms of price or service when a consumer exercises a privacy right

2. How do we comply with CCPA?

To comply with CCPA, consumers must review and accept 365 Retail Market's Privacy Policy, on the point of sale kiosk.

3. What are the workflow changes for new account creation?

- When creating new accounts, consumers will be prompted with 365 Retail Market's new Privacy Policy. They will be required to provide their consent to the policy to continue creating their new account.
- If consumers choose to register biometrics to their new accounts, they will be prompted with 365 Retail Market's new Biometric Policy. They will be required to provide their consent to the policy to save their biometrics to their accounts for future use.

4. What are the workflow changes for existing accounts – account login?

- When accessing their accounts for the first time after CCPA is put into effect, consumers will be prompted with 365 Retail Market's new Privacy Policy. They will be required to provide their consent to the policy to continue using their accounts on the kiosk.
- If consumers use their biometrics to login to their accounts for the first time after CCPA is put into effect, they will be prompted with 365 Retail Market's new Biometric Policy. They will be required to provide their consent to the policy to save their biometrics to their accounts for future use.

5. What are the workflow changes for existing accounts – account purchase?

- When accessing their accounts for the first time after CCPA is put into effect, consumers will be prompted with 365 Retail Market's new Privacy Policy. They will be required to provide their consent to the policy to continue using their accounts on the kiosk to conduct purchases.
- If consumers use their biometrics to login to their accounts for the first time after CCPA is put into effect, they will be prompted with 365 Retail Market's new Biometric Policy. They will be required to provide their consent to the policy in order to save their biometrics to their accounts for future use and complete their purchases.



6. What happens to a consumer's account if they decline the Privacy Policy – new account?

If a consumer chooses not to provide their consent during the new account creation process, they will be brought back to the **Home** screen on the kiosk and an account will not be created for future use.

7. What happens to a consumer's account if they decline the Privacy Policy – existing account?

If a consumer chooses not to provide their consent to the new Privacy Policy, they will be prompted to email our Data Protection Officer (DPO) at privacy@365smartshop.com. The DPO will permanently delete their account and all personal information from 365 Retail Market's servers, typically within seven days (unless a longer retention is needed). The consumer will not be able to use their account during this waiting period, unless they accept the policy.

8. What happens to a consumer's account if they accept the Privacy Policy but decline the Biometric Policy?

If a consumer chooses not to provide their consent to the new Biometric Policy, their biometric record will automatically be deleted from their account at the kiosk. They may still access their account by using a scan ID, UserName, their email address or the QR code on the 365Pay app.

9. What is the process for a GMA consumer to get a refund to their account?

- 365 will confirm with the consumer by email that they want to permanently close their account and receive a refund. Information will be logged about the consumer to initiate the refund.
- 365 will inform the operator that a refund has been requested and provide all relevant consumer contact information.
- 365 will initiate the "Payout and Close" process, which returns any unused funds to the operator through their next GMA disbursement.
- 365 will initiate the "Forget" process, where all the consumer's information will be deleted.
- The operator will give the consumer their refund.

10. What is the process for a non-GMA consumer to get a refund to their account?

- 365 will confirm with the consumer by email that they want to permanently close their account and receive a refund. Information will be logged about the consumer to initiate the refund.
- 365 will inform the operator that a refund has been requested and provide all relevant consumer contact information.
- 365 will initiate the "Forget" process, where all the consumer's information is deleted.
- Operator will give the consumer their refund.



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11. Where can I view the latest terms and policies?

The latest terms and policies are available:

- In your account on the kiosk
- In the 365Pay app
- Online at: <https://365retailmarkets.com/consumer-policy>

