**PestCo** **Privacy Notice**

**Last Updated/Effective Date**: 1/17/2023

PestCo Holdings, LLC, its affiliates and its subsidiaries (“**Company**,” “**we**,” “**us**,” or “**our**”) respect your privacy. This Privacy Notice describes the processing of Personal Information (defined below) that is provided, collected, or shared on the sites, applications, social media pages, or other platforms that link to this Privacy Notice (collectively, the “**Site**”). It also describes your choices about the collection, sharing, and use of your Personal Information.

We may modify this Privacy Notice at any time. All changes will be effective immediately upon posting to the Site. Material changes will be conspicuously posted on the Site or otherwise communicated to you.

1. **Personal Information We Collect**

We may collect a range of Personal Information. “Personal Information” means information that uniquely identifies, relates to, describes, or is reasonably capable of being associated with or linked to you.

The types of Personal Information we collect may include:[[1]](#footnote-1)

* **Contact Information** – If you submit an inquiry, register for an account, or provide information on our Site, we may collect your contact information. This may include your name, email address, demographic information, and phone number.
* **Financial Information** – If you make any purchases through our Site, we will collect your financial information, including your name and payment information.
* **Location Data** – While navigating our Site your mobile device or browser may share your location data, both through WiFi and GPS. We will collect this information based on the settings of your phone and browser.
* **Usage Information** – When you use our Site, our servers may automatically record information, including your Internet Protocol address (IP Address), browser type, referring URLs (e.g., the site you visited before coming to our Site), domain names associated with your internet service provider, information on your interaction with the Site, and other such information.
* **Employment Information** – If you apply for employment, we will collect your employment and work history, as well as other Personal Information related to your potential employment. This may include your education and employment history, address and contact information, demographic information, and any other information included in your resume or application.
* **Communication Information[[2]](#footnote-2) –** We may collect audio, electronic, or visual information, which includes screen sharing views; any data in any files uploaded, emailed or otherwise provided by customers; the contents of your communications with us, whether via e-mail, social media, telephone or otherwise, and inferences we may make from other Personal Information we collect.

# **How We Collect Your Personal Information**

# **We May Collect Your Personal Information Directly From You –** For example, if you request or purchase products, services, or information from us.

# **We May Also Collect Personal Information From Third Parties** – For example, we may work with business partners, subcontractors, advertising networks, analytics providers, and search information providers, who may provide us with Personal Information about you.

# **Through Online Tracking Technologie**s – We and our service providers may use cookies, device identifiers, and similar technologies such as pixels, web beacons, and local storage to collect usage and browser information about how you use the Site. We process the information collected through such technologies, which may include or be combined with Personal Information, to help operate certain features of the Site, to enhance your experience through personalization, and to help us better understand the features of the Site that you and other users are most interested in.

# Most browsers provide you with the ability to block, delete, or disable cookies, and your mobile device may allow you to disable transmission of unique identifiers and location data. If you choose to reject cookies or block device identifiers, some features of the Site may not be available, or some functionality may be limited or unavailable. Please review the help pages of your browser or mobile device for assistance with changing your settings.

# Some of our service providers or plug-ins may use cookies or other methods to gather information regarding your use of the Site and may combine the information in these cookies with any Personal Information about you that they may have. The use of such tracking information by a third party depends on the privacy notice of that third party. We do not respond to Do Not Track (“DNT”) signals sent to us by your browser at this time. To learn more about how DNT works, please visit <http://allaboutdnt.com/>.

# Online Behavioral Advertising. We use third parties and/or service providers to provide interest-based advertising services. These services may serve advertisements on our behalf that are customized based on predictions about your interests generated from your visits to websites (including this Site) over time and across different websites. The data collected may be associated with your Personal Information. These advertisements may appear on the Site and on other websites, and may be sent to you via email.

# We use Google Ads to serve ads across various websites. Google uses Cookies to collect data about your visits to the Site to generate targeted advertisements to you on other websites that you visit. To opt-out of this type of advertising by Google, to customize your ad preferences, or to limit Google’s collection or use of such data, visit [Google’s Safety Center](https://www.google.com/safetycenter/tools) and [Google’s Ad Settings](http://www.google.com/settings/ads) and follow [Google’s personalized ad opt-out instructions](https://support.google.com/ads/answer/2662922?hl=en&ref_topic=7048998). Opting out will not affect your use of the Site.

# To change your preferences with respect to certain online ads or to obtain more information about ad networks and online behavioral advertising, visit [National Advertising Initiative Consumer opt-out page](http://www.networkadvertising.org/choices) or the [Digital Advertising Alliance Self-Regulatory Program](http://www.aboutads.info). Changing your settings with individual browsers or ad networks will not necessarily carry over to other browsers or ad networks. As a result, depending on the opt-outs you request, you may still see our ads. Opting-out of targeted advertising does not opt you out of all ads, just those targeted to you.

# **Through Analytics [[3]](#footnote-3)–** We use analytics services, including Google Analytics, to assist us with analyzing our website traffic through cookies and similar technologies. To learn more about how Google uses data, visit [Google’s Privacy Policy](http://www.google.com/policies/privacy) and Google’s page on “[How Google uses data when you use our partners’ sites or apps](http://www.google.com/policies/privacy/partners).” You may download the [Google Analytics Opt-out Browser Add-on](https://tools.google.com/dlpage/gaoptout) for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Websites](https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage).

# **How We Use Personal Information[[4]](#footnote-4)**

To the extent permitted by applicable law, we may use Personal Information to:

* operate the Site and provide support to our business functions;
* fulfill customer requests, such as to create an account or complete customer purchases;
* protect against criminal activity, claims and other liabilities;
* send you information about our company, products, services, and promotions;
* respond to reviews, comments, or other feedback provided to us;
* support and personalize the Site and our advertising efforts;
* protect the security and integrity of the Site;
* provide customer support;
* the extent required for benchmarking, data analysis, audits, developing new products, enhancing the Site, facilitating product, software and applications development, improving the Site or our services, conducting research, analysis, studies or surveys, identifying usage trends, as well as for other analytics purposes;
* meet our contractual requirements;
* comply with applicable legal or regulatory requirements and our policies;
* respond to inquiries related to employment opportunities;
* market, advertise, and provide the Site and our services; and
* the extent necessary for any other lawful purpose for which the Personal Information is collected.

# **Sharing of Personal Information**

# We may share your Personal Information in the following circumstances:

# **To Third Parties for Marketing Purposes** – We may share your Personal Information with third parties for their marketing purposes. This may include third parties whose services we believe you may be interested, or who are interested in providing you with services.

# **For Legal Obligation or Safety Reasons –** When we have a good faith belief that access, use, preservation or disclosure of Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of the Terms of Use, (c) detect, prevent, or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety ofCompany**,** its users, or the public against harm.

# **In the Case of a Merger or Sale –** If and when we are involved in a merger, acquisition, or any form of transfer or sale of some or all of its business, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding. Personal Information may be transferred along with the business. Where legally required we will give you prior notice and if you have a legal right to do so, an opportunity to object to this transfer.

# **To Service providers** – When we hire a service provider to help operate the Site or our business, we may give access to Personal Information as necessary to perform the service for Company. This may include service providers that operate our Site, send our communications, or run our promotions.

# **To Business Partners** – We may share Personal Information with our trusted business partners. For example, we may share your Personal Information with a company when we co-sponsor a promotion or service. These partners and affiliates may use your Personal Information to, among other things, send you information or contact you about their services and products.

# **How Long Do We Keep Your Personal Information**

We will retain your Personal Information for as long as necessary to fulfill the purposes for which it has been collected, as outlined in this Privacy Notice, or any longer retention period required by law.

# **How We Protect Your Personal Information**

We use our commercially reasonable efforts to protect the confidentiality and security of Personal Information we process. However, despite these efforts to store Personal Information in a secure operating environment, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems. Further, while we attempt to ensure the integrity and security of Personal Information, we cannot guarantee that our security measures will prevent third parties such as hackers from illegally obtaining access to Personal Information.

1. **Your Choices and Controls**

Depending on where you live, you may have the right to exercise certain controls and choices regarding our collection, use, and sharing of your Personal Information. To opt-out of marketing communications please email us at **[info@pointepestcontrol.net][[5]](#footnote-5)** or by following the instructions included in the email or text correspondence.

Please note that, even if you unsubscribe from certain correspondence, we may still need to contact you with important transactional or administrative information, as permitted by law. Additionally, if you withdraw your consent or object to processing, or if you choose not to provide certain Personal Information, we may be unable to provide some or all of our services to you.

To exercise other rights with respect to your Personal Information, please see Section 13.

# **International Use of the Site**

This Site is hosted in the United States. If you are visiting this Site from outside of the United States, please note that by providing your Personal Information it is being transferred to, stored, collected, or processed in the United States, where our data center and servers are located and operated.

1. **Children’s Privacy**

We do not knowingly collect or solicit any Personal Information from children under the age of 16.[[6]](#footnote-6) In the event that we learn that we have collected Personal Information from a child, we will promptly take steps to delete that information. If you are a parent or legal guardian and think your child has given us their Personal Information, you can email us at **[info@pointepestcontrol.net] [[7]](#footnote-7)** or contact us using the information listed in Section 13.

1. **Links to Third-Party Websites**

We are not responsible for the practices employed by any websites or services linked to or from the Site, including the information or content contained within them. We encourage you to investigate and ask questions before disclosing Personal Information to third parties, since any Personal Information disclosed will be subject to the applicable third party’s Privacy Notice.

1. **California Residents**

This Section applies to our collection and use of “Personal Information” if you are a resident of California, as required by the California Consumer Privacy Act of 2018 and its implementing regulations, as amended by the California Privacy Rights Act (the “**CPRA**”). This Section describes (1) the categories of Personal Information, collected and disclosed by us, subject to CPRA, (2) your privacy rights under CPRA, and (3) how to exercise your rights.

When we use the term “Personal Information” in the context of the CPRA, we mean information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or household.

If you would like to receive a copy of this Section in an alternate format (e.g., printable) or language, please contact us using the information provided in Section 13.

1. **Categories of Personal Information Collected, Used, and Shared[[8]](#footnote-8)**

We have collected the following categories of Personal Information from our consumers within the last 12 months. The sources from which we obtain this information and the ways in which we use this information are set forth in Section 2 above. We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

| **Category** | **Examples** | **Collected** |
| --- | --- | --- |
| Identifiers. | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers. | [Yes |
| Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.Some personal information included in this category may overlap with other categories. | [Yes] |
| Protected classification characteristics under California or federal law. | Age (40 years or older), marital status, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status. | [Yes] |
| Commercial information. | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | [Yes] |
| 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 patterns, and sleep, health, or exercise data. | [No] |
| Internet or other similar network activity. | Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement. | [Yes] |
| Geolocation data.[[9]](#footnote-9) | Physical location or movements. | [Yes] |
| Sensory data. | Audio, electronic, visual, thermal, olfactory, or similar information. | [No] |
| Professional or employment-related information. | Current or past job history or performance evaluations. | [Yes] |
| Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). | 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] |
| Inferences drawn from other personal information. | Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | [Yes] |
| Sensitive personal information[[10]](#footnote-10) | Social security, driver’s license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of a consumer’s mail, email, and text messages unless the business is the intended recipient of the communication; genetic data; biometric information for the purpose of uniquely identifying a consumer; personal information collected and analyzed concerning a consumer’s health; or personal information collected and analyzed concerning a consumer’s sex life or sexual orientation. | [Yes] |

We share each of these categories of Personal Information with our service providers to the extent necessary for them to facilitate our business purposes. We also share this Personal Information for the purposes set forth in Section 4 above.

We will retain your Personal Information for as long as we need it to provide you with our products and services. Because the length of your use of our services are not foreseeable, we cannot provide you with an exact timeframe for how long we retain your information. Our legal obligations may also require us to maintain your Personal Information for longer periods of time if your Personal Information becomes subject to such legal obligations.

1. **Your California Privacy Rights**

If you are a resident of California, you have the following rights:

|  |  |
| --- | --- |
| Privacy Right | Description |
| Notice  | The right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and shared. |
| Access | The right to request the categories of Personal Information that we collected in the previous twelve (12) months, the categories of sources from which the Personal Information was collected, the specific pieces of Personal Information we have collected about you, and the business purposes for which such Personal Information is collected and shared. You may also have the right to request the categories of Personal Information which were disclosed for business purposes, and the categories of third parties in the twelve (12) months preceding your request for your Personal Information. |
| Data Portability | The right to receive the Personal Information you have previously provided to us.  |
| Erasure  | The right to have your Personal Information deleted. However, please be aware that we may not fulfill your request for deletion if we (or our service provider(s)) are required or permitted to retain your Personal Information for one or more of the following categories of purposes: (1) to complete a transaction for which the Personal Information was collected, provide a good or service requested by you, or complete a contract between us and you; (2) to ensure our website integrity, security, and functionality; (3) to comply with applicable law or a legal obligation, or exercise rights under the law (including free speech rights); or (4) to otherwise use your Personal Information internally, in a lawful manner that is compatible with the context in which you provided it. |
| Correction | You have the right to request that we correct any incorrect personal information that we collect or retain about you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see below), we will correct (and direct any of our service providers that hold your data on our behalf to correct) your personal information from our records, unless an exception applies. We may deny your correction request if (a) we believe the personal information we maintain about you is accurate; (b) correcting the information would be impossible or involve disproportionate; or (c) if the request conflicts with our legal obligations. |
| To Opt Out of Sales or Sharing of Personal Information  | We do not sell or share [[11]](#footnote-11)your Personal Information. However, if we did, you would have the right to opt out of the sale or sharing of your Personal Information. |

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a request related to your Personal Information. You may also make a request on behalf of your minor child.

You may only make a request for access or data portability twice within a 12-month period. The request must:

* Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
* Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
1. **Colorado, Connecticut, Virginia, and Utah Residents**

This Section 12 applies to our collection and use of Personal Information if you are a resident of Colorado, Connecticut, Virginia, or Utah, as required by the Colorado Privacy Act, Connecticut Act Concerning Personal Data Privacy and Online Monitoring, Virginia Consumer Data Protraction Act, and Utah Consumer Privacy Act.

For a description of the categories of Personal Information collected and disclosed by us and whether such Personal Information is sold or shared, please see Section 11(A).

As a resident of Colorado, Connecticut, Virginia, and Utah, you have the following rights with respect to your Personal Information:

* Notice
* Access
* Data Portability
* Erasure
* Correction
* Opt Out of Sales of Personal Information

For a description of these rights, see Section 11(B) above. In addition, you have the right to opt out of targeted advertising and profiling, to the extent that profiling makes decisions that produce legal or similarly significant effects concerning you. To exercise any of these rights available to you, see Section 13 below.

Where we collect sensitive Personal Information from you, we will only do so where we have obtained your prior express consent, if required.[[12]](#footnote-12)

1. **Exercising Your Individual Privacy Rights**

To exercise any of the privacy rights afforded to you under applicable data protection law, please submit a request to us by one of the following methods:

* Calling us at **[708-416-8042][[13]](#footnote-13)**
* E-mailing us at **[info@pointepestcontrol.net][[14]](#footnote-14)**

**California Residents:** If you would like to opt out of sharing or the sales of your Personal Information, you may submit your opt-out request here: **[www.pointepestcontrol.net/privacy-page-do-not-share-my-personal-data/]. [[15]](#footnote-15)** If you would like to limit the use of your sensitive Personal Information, you may submit your request here: [**www.pointepestcontrol.net/privacy-page-do-not-share-my-personal-data/].] [[16]](#footnote-16)**

**Colorado, Connecticut, Virginia, and Utah Residents:** If you would like to opt out of targeted advertising, the sale of your Personal Information, or profiling, you may submit your opt-out request here: **[www.pointepestcontrol.net/privacy-page-do-not-share-my-personal-data/].] [[17]](#footnote-17)**

**Verification:** We must verify your identity before fulfilling your requests. If we cannot initially verify your identity, we may request additional information to complete the verification process. We will only use Personal Information provided in a request to verify the requestor’s identity. If you are an authorized agent making a request on behalf of a California consumer, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney.

We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.[[18]](#footnote-18)

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us.

We may deny certain requests, or only fulfill some in part, as permitted or required by law. For example, if you request to delete Personal Information, we may retain Personal Information that we need to retain for legal purposes

**Appeals:** If you are not satisfied with the resolution of your request and would like to submit an appeal, please click here: **[www.pointepestcontrol.net/privacy-page-appeals/]. [[19]](#footnote-19)**

1. **Changes to this Privacy Notice**

Please note that we may modify or update this Privacy Notice from time to time, so please review it periodically. We may provide you with an updated Privacy Notice if material changes are made. Unless otherwise indicated, any changes to this Privacy Notice will apply immediately upon posting to the Site.

1. **Contact Us**

# If you have any questions about our practices or this Privacy Notice, please contact us at **[info@pointepestcontrol.net]**. **[[20]](#footnote-20)** You may also write to us at:

# **c/o PestCo Holdings, LLC**

# **Attn: [Privacy Administrator]**

# **393 W. State Street, Suite C**

# **Eagle, Idaho 83616**

1. NTD: To confirm this is an exhaustive list of information collected for each site where this will be used. [↑](#footnote-ref-1)
2. NTD: To confirm if any site has chat features. Additional language may need to be added to address this type of feature. WE DO NOT HAVE ANY CHAT FEATURES. [↑](#footnote-ref-2)
3. NTD: To be confirmed Please confirmed if the applicable Company uses third-party data analytics providers. To the extent the applicable Company utilizes third-party data analytics providers from the United States (i.e., Google Analytics), such Company should take steps to enable settings that (1) encrypt personal data; and (2) ensure the provider only has access to data on an aggregate level (as opposed to an identifiable level). [↑](#footnote-ref-3)
4. NTD: To be confirmed if the applicable Company uses personal information in any way not outlined in this section. [↑](#footnote-ref-4)
5. NTD: We recommend using a privacy specific email address. Sean to create and insert. [↑](#footnote-ref-5)
6. NTD: We have inserted this for the time being due to the kids’ page on the Reliable site. However, with the Reliable Kids’ Corner page (<https://reliablepestsolutions.com/kids-corner/>), we likely cannot say that we do not collect information from children under the age of 16. Once all the kid related subdomains are removed, this provision could be removed. [↑](#footnote-ref-6)
7. NTD: We recommend using a privacy specific email address. Sean to create and insert. [↑](#footnote-ref-7)
8. NTD: Please confirm this is an exhaustive list of personal information that the applicable Company collects. For any row that is “No” – the row can be removed. [↑](#footnote-ref-8)
9. NTD: To be confirmed whether precise geolocation data is collected. Precise geolocation is now considered a sensitive category of personal information. Under the CPRA, precise geolocation is any data that is derived from a device and that is used or intended to be used to locate a consumer within a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet [↑](#footnote-ref-9)
10. NTD: To be confirmed if the applicable Company collects any of this information. If so, please confirm the uses for which such information is collected. Are the uses of such information limited to the services being provided to a consumer? [↑](#footnote-ref-10)
11. NTD: To be confirmed if the applicable Company sells/shares personal information. See definitions for clarity below:

“Selling” means “selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means a consumer's personal information for monetary or other valuable consideration.”

“Sharing” under the CPRA means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to a third party for cross-context behavioral advertising.

“Cross-context behavioral advertising” means the targeting of advertising to a consumer based on the consumer’s personal information obtained from the consumer’s activity across businesses, distinctly-branded websites, applications, or services, other than the business, distinctly-branded website, application, or service with which the consumer intentionally interacts. [↑](#footnote-ref-11)
12. NTD: Can be removed if no sensitive Personal Information is collected (see above chart in Section 11A for sensitive Personal Information). [↑](#footnote-ref-12)
13. NTD: CCPA/CPRA requires a toll-free number for exercise of rights. Sean to create and insert. [↑](#footnote-ref-13)
14. NTD: Sean to create and insert. [↑](#footnote-ref-14)
15. NTD: Sean to create and insert. [↑](#footnote-ref-15)
16. NTD: Sean to create and insert. [↑](#footnote-ref-16)
17. NTD: Sean to create and insert. [↑](#footnote-ref-17)
18. NTD: To confirm whether the applicable Company will respond to individuals via an account. This is not a requirement. [↑](#footnote-ref-18)
19. NTD: Sean to create and insert. [↑](#footnote-ref-19)
20. NTD: Sean to create and insert. [↑](#footnote-ref-20)