

www.christmascorp.com Privacy Policy

Type of website: Digital investment adviser

Effective date: 16th day of August, 2021

www.christmascorp.com (the "Site") is owned and operated by Christmas Corporation. Christmas Corporation can be contacted at:

customer@christmascorp.com

2081 Center St, Suite 120, Berkeley, CA 94704

Purpose

The purpose of this privacy policy (this "Privacy Policy") is to inform users of our Site of the following:

1. The personal data we will collect;
2. Use of collected data;
3. Who has access to the data collected;
4. The rights of Site users; and
5. The Site's cookie policy.

This Privacy Policy applies in addition to the terms and conditions of our Site.

Consent

By using our Site users agree that they consent to:

1. The conditions set out in this Privacy Policy; and
2. The collection, use, and retention of the data listed in this Privacy Policy.

How We Use Personal Data

Data collected on our Site will only be used for the purposes specified in this Privacy Policy or indicated on the relevant pages of our Site. We will not use your data beyond what we disclose in this Privacy Policy.

Who We Share Personal Data With

Employees

We may disclose user data to any member of our organization who reasonably needs access to user data to achieve the purposes set out in this Privacy Policy.

Other Disclosures

We will not sell or share your data with other third parties, except in the following cases:

1. If the law requires it;
2. If it is required for any legal proceeding;
3. To prove or protect our legal rights; and
4. To buyers or potential buyers of this company in the event that we seek to sell the company.

If you follow hyperlinks from our Site to another Site, please note that we are not responsible for and have no control over their privacy policies and practices.

How Long We Store Personal Data

User data will be stored until the purpose the data was collected for has been achieved.

You will be notified if your data is kept for longer than this period.

How We Protect Your Personal Data

In order to protect your security, we use the strongest available browser encryption and store all of our data on servers in secure facilities. All data is only accessible to our employees. Our employees are bound by strict confidentiality agreements and a breach of this agreement would result in the employee's termination.

While we take all reasonable precautions to ensure that user data is secure and that users are protected, there always remains the risk of harm. The Internet as a whole can be insecure at times and therefore we are unable to guarantee the security of user data beyond what is reasonably practical.

Children

We do not knowingly collect or use personal data from children under 13 years of age. If we learn that we have collected personal data from a child under 13 years of age, the personal data will be deleted as soon as possible. If a child under 13 years of age has provided us with personal data their parent or guardian may contact our privacy officer.

Do Not Track Notice

Do Not Track ("DNT") is a privacy preference that you can set in certain web browsers. We do not track the users of our Site over time and across third party websites and therefore do not respond to browser-initiated DNT signals.

Cookie Policy

A cookie is a small file, stored on a user's hard drive by a website. Its purpose is to collect data relating to the user's browsing habits. You can choose to be notified each time a cookie is transmitted. You can also choose to disable cookies entirely in your internet browser, but this may decrease the quality of your user experience.

We do not use cookies on our Site.

Modifications

This Privacy Policy may be amended from time to time in order to maintain compliance with the law and to reflect any changes to our data collection process. When we amend this Privacy Policy we will update the "Effective Date" at the top of this Privacy Policy. We recommend that our users periodically review our Privacy Policy to ensure that they are notified of any updates. If necessary, we may notify users by email of changes to this Privacy Policy.

California Consumer Privacy Act Privacy Notice

Website: www.christmascorp.com

This Privacy Notice supplements the www.christmascorp.com Privacy Policy and applies solely to California consumers who visit www.christmascorp.com. Any terms defined in the California Consumer Privacy Act of 2018 (“CCPA”) have the same meaning when used in this Privacy Notice.

Information We Collect

We have collected the following categories of personal information about consumers in the past twelve (12) months:

1. Identifiers such as a real name, alias, postal address, online identifier, internet protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers;
2. Commercial information such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
3. Internet or other electronic network activity information such as browsing history, search history, and information regarding a consumer’s interaction with an internet website, application, or advertisement; and
4. Professional or employment-related information such as occupation, job history, or employer information.

Sources of Information

We collect the categories of personal information listed above from the following categories of sources:

1. Directly from users from the documents they provide us to access our services, directly from user submissions on our website, indirectly from user activity on our website..

Use of Personal Information

We may use or disclose personal information for one or more of the following business purposes:

1. to manage clients assets and to comply with know your customer (KYC) regulations..

Sharing Personal Information

We have not disclosed consumer personal information in the past twelve (12) months.

Sale of Personal Information

We have not sold consumer personal information in the past twelve (12) months.

Your Rights and Choices

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how you can exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that www.christmascorp.com disclose to you certain information about our collection and use of your personal information in the past 12 months. Once we receive and confirm your verifiable consumer request (see the *Exercising Your Access and Deletion Rights* section below), we will disclose to you:

1. The categories of personal information we collected about you;
2. The categories of sources from which we collected personal information about you;
3. Our business or commercial purpose for collecting or selling personal information;
4. The categories of third parties with whom we share personal information; and
5. The specific pieces of personal information we have collected about you (also called a data portability request).

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected and retained, subject to certain exceptions. Once we have received and confirmed your verifiable consumer request, we will delete, and direct any of our service providers to delete, your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
3. Debug products to identify and repair errors that impair existing intended functionality;
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;

5. Comply with the *California Electronic Communications Privacy Act* (Cal. Penal Code § 1546 seq.);
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when deletion of the information is likely to render impossible or seriously impair the research's achievement, if you previously provided informed consent;
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
8. Comply with a legal obligation; or
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Your Access and Deletion Rights

To exercise your access and deletion rights described above, please submit a verifiable consumer request to us at:

1. customer@christmascorp.com.

You may only make a verifiable consumer request for access twice within a 12-month period. The verifiable consumer request must:

1. Provide enough information for us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
2. Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. You are not required to make an account with us to make a verifiable consumer request. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavour to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We

will deliver our written response electronically or by mail, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer 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.

Non-Discrimination

You have the right to not be discriminated against in pricing and services because you exercise any of your CCPA rights. Unless permitted by the CCPA, we will not use whether or not you have exercised your CCPA rights to:

1. Deny you goods or services;
2. Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
3. Provide you a different level or quality of goods or services; or
4. Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes To This Privacy Notice

We may amend this Privacy Notice from time to time to maintain compliance with the law and to reflect any changes to our data collection process. We recommend you check this Privacy Notice from time to time to ensure you are aware of any changes. If necessary, we may notify you by email of changes to this Privacy Notice.

Contact Information

If you have any questions or concerns, you can contact us at:

customer@christmascorp.com

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