

VIRGINIA CONSUMER PRIVACY NOTICE ADDENDUM

Last updated: January 1, 2023.

GPM Investments, LLC (“GPM”, “we”, “us”, “our”) is committed to protecting your personal information and your right to privacy. This Virginia Consumer Privacy Notice Addendum (“Notice”) applies solely to residents of Virginia (“you”) and describes our current policies regarding the collection, use, distribution, and protection of your Personal Data (as defined below) you share with us, our subsidiaries, and affiliates, on any of our websites (the “Websites”), through any of our services (the “GPM Services” and together with the Websites, the “Services”), when you visit our stores or otherwise interact or communicate with us, and our mobile applications which include the following policy [[link to Mobile Policy](#)]. This Notice supplements our main Privacy Statement located at [[link to main Privacy Statement](#)].

If you have any questions or concerns about this Notice, please contact us at legal@gpminvestments.com.

1. WHAT PERSONAL DATA DO WE PROCESS?

GPM may collect, use, store, disclose, analyze, delete, and/or modify (“process”) Personal Data as described in this Notice. “Personal Data” includes information that is linked to or reasonably associated with an individual, not including de-identified data or publicly available information.

GPM has processed the following categories of Personal Data:

- Personal identifiers such as names, phone numbers, email addresses, mailing addresses, usernames; passwords, and contact or authentication data;
- Personal Data that is consider “Sensitive Data,” such as precise geolocation data (if you consent to providing such data);
- Payment information such as billing data, billing addresses, debit and credit card numbers, and other similar information provided to us when you make an in-store or on-line purchase;
- Computer, device and technical information, which includes data through which your identity is not readily ascertainable but collected automatically through your use of the Websites or the Services, such as device and usage information including your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Websites and other technical information.

2. WHY DO WE PROCESS OR SHARE YOUR PERSONAL DATA?

We process your Personal Data for legitimate business interests, such as providing you with the Websites and the Services, to fulfill our contracts with you, to fulfill and manage your orders, payments, returns, and exchanges, to facilitate account creation and log-on processes, to request feedback regarding our Websites and Services, to manage user accounts, to send administration information to you (e.g., to send you information regarding products, services, new features,

changes to our terms, conditions, and policies), to administer prize draws and competitions, and for other business purposes such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Websites, Services, products, marketing and your experience.

We may use your Personal Data to respond to user inquiries/offer support to users. We may use your data to respond to your inquiries and solve any potential issues you might have with the use of our Services.

We may process Personal Data for purposes of maintaining the security and operation of our Websites and Services and for our internal analytics and reporting purposes (e.g., for fraud monitoring and prevention to keep our Websites safe and secure). We may also process Personal Data for purposes of enforcing our terms, conditions and policies for business purposes and to comply with legal and regulatory requirements.

With your consent, we and/or our third-party marketing partners may use your Personal Data to send you marketing and promotional communications or for our marketing purposes. You can opt-out of our marketing emails at any time.

We also use your Personal Data to deliver targeted advertising to you with your consent. We may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness. You may opt-out of targeted advertising by contacting us at fasREWARDS@gpminvestments.com.

3. HOW DO WE SHARE YOUR PERSONAL DATA?

GPM does not sell Personal Data for monetary consideration.

GPM may share certain types of Personal Data in connection with providing the Services, as required by law or to protect our business interests. For example, we may share your Personal Data:

- With service providers acting on our behalf,
- With other participants in the payment ecosystem, including financial institutions, and merchants.
- With third parties for fraud monitoring and prevention purposes, or other purposes required by law.
- In connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- [targeted advertising]

4. VIRGINIA CONSUMER RIGHTS.

Please contact GPM at legal@gpminvestments.com if you wish to request to exercise any of the following rights under the Virginia Consumer Data Protection Act § 59.1-573:

- To confirm whether or not we process your Personal Data and to access such data;
- To correct inaccuracies in your Personal Data (taking into account the nature of the Personal Data and our purpose(s) for processing of such data);
- To delete your Personal Data;
- To obtain a copy of your Personal Data (taking into account the extent this is technically feasible); and
- To opt-out of the processing of your Personal Data for purposes of targeted advertising (GPM does not sell or process Personal Data for purposes of profiling).

You may also contact GPM at legal@gpminvestments.com if you wish to appeal GPM's decision with regard to a request. GPM does not discriminate against consumers that may exercise any of the above consumer rights.

5. HOW DO WE KEEP YOUR PERSONAL DATA SAFE?

GPM has implemented and shall maintain reasonable administrative, technical, and physical data security practices to protect the confidentiality, integrity, and accessibility of Personal Data. Such data security practices are appropriate to the volume and nature of the Personal Data.

6. CHANGES TO THIS NOTICE.

The top of this Notice will include the date it was most recently updated. Using our Websites and Services where this Notice is posted constitutes your acceptance of our privacy practices described herein.

7. CONTACT INFORMATION.

If you have questions about this notice, you may reach us by email, telephone or US Mail as follows:

Email: fasREWARDS@gpminvestments.com

Toll-Free Telephone: 1-844-400-1035

Postal Address:

fas REWARDS® Customer Service
8565 Magellan Pkwy Suite 400
Richmond, VA 23227