

**Last Updated Date: April 18, 2023**

## Privacy Notice

This Privacy Notice explains how The Wills Group Inc. and its affiliates, including Dash In; and Splash In; and SMO Motor Fuels (collectively, “The Wills Group”), collect, use, share, or otherwise process information that relates to you (“Personal Information”).

This Privacy Notice applies to Personal Information The Wills Group collects both online and offline, including when you access and use our websites (including [www.willsgroup.com](http://www.willsgroup.com), [www.dashin.com](http://www.dashin.com), and [www.splashin.com](http://www.splashin.com)), mobile applications, or any other applications or services that link to this Privacy Notice; visit us at our locations; use or request our products and services; or otherwise engage with us.

Our websites, products and services, content, applications, and other interactions with you are collectively defined in this Privacy Notice as the “Services”.

If you have any questions or comments about the Privacy Notice or our privacy practices, please contact us at [contactme@willsgroup.com](mailto:contactme@willsgroup.com).

### **Table of Contents.**

Clicking on the links below will take you directly to the corresponding section of this Privacy Notice.

- Section 1: Personal Information We Collect
- Section 2: How We Use Personal Information
- Section 3: How Personal Information Is Disclosed or Shared
- Section 4: Retention of Personal Information
- Section 5: Your Privacy Rights and Other Choices
- Section 6: Security Practices
- Section 7: Where Personal Information is Processed and Stored
- Section 8: Children
- Section 9: Links to Other Websites and Sites
- Section 10: Changes to this Privacy Notice
- Section 11: How to Contact Us
- Section 12: Information for California Residents

### **1. Personal Information We Collect.**

The types of Personal Information that we collect about you depends on your interaction with us and the Services you use. This section describes the types of Personal Information that we may have collected and from where the information was sourced. The information we collect generally falls into three categories: (i) information you provide us; (ii) information we collect through automated means; (iii) information provided by others.

#### **1.1. Information You Voluntarily Provide.**

We collect Personal Information that you voluntarily provide to us, including when signing up for, or participating in, any rewards programs we offer. The categories of Personal Information that we may collect from you include:

- **Identifiers**, such as a real name, email address, postal address, phone number, physical address, driver’s license number (which is categorized as a type of “sensitive personal information” under California law

and is only used to verify your age for restricted item purchases), age, username, profile information, unique online identifier such as social media handle, or other similar identifiers.

- **Transaction Information**, such as information about your payment methods, including your credit or debit card numbers.
- **User Content**, such as comments or other material that you post to our blogs or other forums on our Services.
- **Any other information you may choose to provide.**

## **1.2. Information We May Generate or Collect Automatically.**

We may generate or collect automatically certain types of Personal Information when you interact with us and our Services, including through our emails and SMS campaigns. The type of Personal Information we collect in this context may include:

- **Identifiers.** When you use our Services, certain data that uniquely identifies you or the device through which you interact with our Services, such as your name, email address, username; cookie identifiers, mobile advertising identifiers, and other unique identifiers; or when you interact with us using social media, including your user ID, profile picture, photos posted and similar information.
- **Device Information**, such as information pertaining to the device through which you interact with our Services, such as your IP address, the type of device used to interact with the Services, that device's operating system and version, MAC address, user settings, carrier information, or your browser type.
- **Internet or other electronic network activity**, such as browsing history, search history, IP address, MAC address, information on a consumer's interaction with us and our Services, which may include pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services, including your operating system, your web browser software, the type of handheld or mobile device you used to link to the web page, and the language and time zone settings on your web browser.
- **Commercial information**, such as a record of our products and services that you may have purchased, obtained, or considered.
- **Geolocation information**, such as the region or general location where your computer or device is accessing the internet or your precise geolocation information (such as your latitude and longitude coordinates). Your precise geolocation will only be collected if you consent to such collect (e.g., through our mobile app) so that we may provide you with content based on your location and proximity to our retail locations. Once you consent to sharing your precise geolocation information with us, you can choose to stop the collection of this information at any time by changing the preferences on your mobile device settings.
- **Audio and Visual Information**, such as your voice and likeness as captured in photographs, video, or audio recordings if you visit our stores or leave us a voicemail.
- **Inferences** drawn from other Personal Information we collect about you that may relate to your preferences or other matters.

We and our service providers or third parties engaged on our behalf may use cookies, pixel tags, or similar tracking technologies (“**Collection Technologies**”) to gather the information described above when you use, access, otherwise interact with our Services. Below we have described how we use Collection Technologies and the choices you may have.

- **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
- **Web Beacons, Clear GIF, Pixels Tag, and Script.** These Collection Technologies are small transparent image files or lines of code to record how you interact with our Services. For example, the use of these technologies may allow us to record that a user has visited a particular web page or clicked on a particular feature. We may also include these types of Collection Technologies in e-mails to understand whether messages have been opened, acted on, or forwarded.
- **Social Media Platforms.** Our Services may contain social media buttons, including widgets such as the “share this” button or other interactive functions. These features may collect personal information such as your IP address and which page you are visiting on our Services. Your interactions with and on these platforms are governed by the privacy policy of the social media platform or network providing the button or other functionality.

Our use of Collection Technologies generally falls into the categories listed below. Please note that these are the main ways of classifying cookies, although there may be other cookies that will not fit neatly into these categories or may qualify for multiple categories.

<b>Strictly Necessary</b>	Cookies that are necessary for our websites to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms.
<b>Functional</b>	Enable the website to provide enhanced functionality and personalization based on your interaction with the website. For example, they may allow websites to remember the user’s site preferences and choices they make on the site including username, region, and language.
<b>Analytics and Performance</b>	These cookies are used specifically for gathering data on how visitors use a website, which pages of a website are visited most often, or if they get error messages on web pages. Some examples of performance cookies are cookies that count page visits, idle time by a user on a page, bounce rates, and load speeds.
<b>Advertising and Targeting</b>	Specifically designed to gather information from you on your device to display advertisements to you based on relevant topics that interest you.

For information on how to manage your cookie preferences, please see the “Managing Cookie and Other Collection Technologies Preferences” section below.

### **1.3. Information We Collect from Third-Party Sources.**

We may obtain Personal Information from other sources, such as our clients, employees, or business partners, service providers, or from business contact databases and enrichment services. We may also receive information about you from social media platforms, such as when you interact with us on those platforms or access our social media content. Lastly, we may collect information about you from publicly available sources, such as public social media profiles, publications, and other websites or materials available through search engines.

The types of Personal Information we may collect from these third-party sources include:

- **Identifiers**, such as name, telephone number, postal or e-mail address, and social media identifiers.
- **User Content** you post or make available online, such as your social media posts or publications.

## **2. How We Use Personal Information.**

We use Personal Information for a variety of purposes, including:

- **To provide you with our services**, including to fulfill your orders, process your payments, and provide you with information relating to Services that we think you will like.
- **To provide you with access to our websites and mobile applications**, including to operate, troubleshoot, and improve the websites and mobile applications, and maintain the security of both.
- **To respond to or notify you**, including when you place an order; reach out to us with a comment, request, or question; or contact us about purchases, orders, or accounts with us.
- **To personalize your experiences with us**, in our stores, through our Services, or any other interaction with us, or customize or personalize rewards, offers, or promotions, contests or sweepstakes tailored to you.
- **For research and analytical purposes**, including to understand how you use our websites and mobile applications; how you shop or interact with us; the methods and devices you use to access our websites and mobile applications; and to make improvements to our websites, mobile applications, products, and services.
- **For marketing and advertisement purposes**, including to send you marketing and advertising communications tailored to your interests and more general in nature.
- **For our business purposes**, including to operate and improve our business and business activities, for research, to maintain our programs, accounts, and records; to understand your satisfaction with our products and services, including our websites and mobile applications; to detect and prevent fraud or misuse of our Services; and for any other business purpose permitted by law.
- **For compliance, fraud prevention, and safety purposes**, including to defend or protect us, you, our customers, or third parties, from harm or in legal proceedings; maintain the security of our customers, employees, and property; respond to court orders, lawsuits, subpoenas, and law enforcement agency or other government requests; address legal and regulatory compliance; protect our legitimate business interests and legal rights; and notify you of any legal or safety issues.

### 3. How Personal Information Is Disclosed or Shared.

The Wills Group does not disclose Personal Information to third parties in exchange for money. We may, however, disclose the Personal Information we collect to the parties described below for the purposes described in this Notice.

- **Affiliates.** We may share your personal information with our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Notice.
- **Service Providers.** We may share your Personal Information with third parties that provide services on our behalf or help us operate the Services (such as customer support, hosting, analytics, payment processing, email delivery, marketing, ad measurement services, and database management services). These third parties may use your Personal Information only as directed or authorized by us and are prohibited from using or disclosing your information for any other purpose.
- **Advertising or Analytics Providers.** As mentioned above, we may use Personal Information in support of our: (1) advertising and marketing efforts, including to serve interest-based advertisements across the Internet; track and categorize your activity, interests and device(s) used over time on our websites and applications, and on third-party websites and mobile applications; and (2) research and analytics efforts, including to better understand your use our websites and applications to improve those technologies and optimize your experience and interactions. To do this, we may share Personal Information with certain third-party advertising or analytics providers (collectively, “Analytics and Advertising Providers”) through our use of Collection Technologies. These Advertising and Analytics Providers use Collection Technologies on our digital properties to collect and store information about you and your use of the Services.

Our Advertising or Analytics Providers include, for example:

- **Facebook Connect.** For more information about Facebook’s use of your personal information, please visit Facebook’s [Data Policy](#). To learn more about how to opt-out of Facebook’s use of your information, please click [here](#) while logged in to your Facebook account.
- **Google Analytics.** For more information about how Google uses your personal information (including for its own purposes, e.g., for profiling or linking it to other data), please visit [Google Analytics’ Privacy Policy](#). To learn more about how to opt-out of Google Analytics’ use of your information, please click [here](#).
- **Social Media Platforms and Networks.** Includes companies such as Meta (formerly known as “Facebook”) and Instagram, when you choose to use certain features or tools available on our Services that enable you to connect to a social media account or to share content on social media.
- **For Compliance, Fraud Prevention and Safety.** We may share your Personal Information with government entities or law enforcement we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the safety of our employees, our customers, or other individuals and for the compliance, fraud prevention and safety purposes described above in the “How We Use Personal Information” section.

- **Business Transfers.** We may transfer or otherwise share some or all of our business or assets, including your Personal Information, in connection with a business transaction (or potential business transaction) such as a merger, consolidation, acquisition, reorganization, bankruptcy, or dissolution.
- **Your Consent or Instruction.** We may disclose your Personal Information in situations where we have your consent or instruction to do so.

We may share anonymous, de-identified, or aggregate information that cannot reasonably identify you with others for any purpose, as permitted by applicable law. Please note that any Personal Information that you post to a profile, blog, comment section, or forum on our Services or social media pages may be available to other users of those forums or, in some cases, made publicly available.

#### **4. Retention of Personal Information.**

We retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law. Please note that in many situations we must retain all, or a portion, of your Personal Information to comply with our legal obligations, resolve disputes, enforce our agreements, to protect against fraudulent, deceptive, or illegal activity, or for another one of our business purposes.

#### **5. Your Privacy Rights and Other Choices.**

Below are rights and choices you may have with respect to your Personal Information. Please note that some of the rights may vary depending on your state of residence. Our websites, products, and services are intended for residents in the states in which we operate. We do not knowingly collect personal information of residents outside of those states.

##### **5.1. Privacy Rights.**

Certain states provide individuals with data rights. Depending on your state of residence, you may have the right to:

- **Access Your Personal Information,** which includes the right to: (1) confirm whether we are processing your Personal Information; (2) confirm the categories of your Personal Information that we process; and (3) obtain a copy of your Personal Information in a portable format.
- **Correct Your Personal Information.** In some cases, we may provide self-service tools that enable you to do so.
- **Delete Your Personal Information.**
- **Opt-Out of Your Personal Information Being Used for Certain Purposes,** such as: (1) targeted advertising; (2) the “sale” of your Personal Information; and (3) certain profiling activities that result in legal or similarly significant effects on you.

To exercise the Privacy Rights identified above, as they may apply to our information practices, or if you have questions about your privacy rights or would like to appeal a decision made concerning a privacy request you submitted, please contact us by sending an email to [contactme@willsgroup.com](mailto:contactme@willsgroup.com).

As noted above, we may use Collection Technologies for targeted advertising purposes. To learn how you can opt out of your Personal Information being used for such purposes, please see Section 5.4 (“Managing Cookie and Other Collection Technologies Preferences”).

## **5.2. Geolocation Data.**

If you have previously consented to sharing geolocation information with us, you can choose to stop the collection of this information at any time by changing the preferences on your mobile device settings.

## **5.3. Managing Communication Preferences.**

If you no longer wish to receive marketing communications from us, you can let us know by contacting us using the information available in the How to Contact Us section below. Our digital marketing communications may provide unsubscribe or opt-out mechanisms that allow you to modify your communications preferences. Please note that if you opt-out of marketing communications, we may still contact you with non-promotional communications, such as those about ongoing business relations or administrative messages.

## **5.4. Managing Cookie and Other Collection Technologies Preferences.**

When you first visit our website, you will be presented with a banner which offers you a choice about whether to accept or reject cookies or Collection Technologies of different types, with the exception of those cookies which are strictly necessary for a particular service.

If you wish, you can also choose how web browser cookies are handled by your device via your browser settings. Some devices allow you to control this through your device settings. If you choose not to receive cookies at any time, websites may not function properly and certain services will not be provided. Each browser and device is different, so check the settings menu of the browser or device to learn how to change your settings and cookie preferences.

You can find information on how to manage cookie settings on certain browsers via the following links:

- [Cookie settings in Chrome](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Safari](#)

Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#).

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#) and [the Digital Advertising Alliance](#).

As noted above, you can also opt-out of our use of certain Collection Technologies by submitting a request via the “Your Privacy Choices” link, which is available at the bottom of our website.

## **6. Security Practices.**

The Wills Group takes certain administrative, and physical measures to safeguard your Personal Information. While we take steps to protect your Personal Information, no method of safeguard is 100% effective. As a result, we cannot guarantee the security of your Personal Information. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized access, use, disclosure, or loss of Personal Information.

#### **7. Where Personal Information is Processed and Stored.**

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

If we transfer Personal Information which originates in the European Economic Area, Switzerland, and/or the United Kingdom to a country that has not been found to provide an adequate level of protection under applicable data protection laws, one of the safeguards we may use to support such transfer is the EU Standard Contractual Clauses.

For more information about the safeguards that we use for international transfers of your Personal Information, please contact us using the contact methods provided below.

#### **8. Children.**

We do not knowingly solicit, collect, or store any Personal Information from anyone under the age of 13. If we become aware that we have collected or stored Personal Information from an individual under age 13, we will remove his or her Personal Information from our files. If you are a parent or guardian and believe we may have inadvertently collected Personal Information from your child, please notify us immediately by sending an email to [contactme@willsgroup.com](mailto:contactme@willsgroup.com).

#### **9. Links to Other Websites and Sites.**

Our website and mobile applications may contain links to other sites that we do not own or operate. We do not control, recommend, or endorse and are not responsible for these sites or their content, products, services or privacy policies or practices. These other sites may send their own cookies to your device, they may independently collect Personal Information about you or from you, and they may or may not have their own published privacy policies. We encourage you to read the privacy policies of the other websites, mobile applications, and online services you use, as well as the privacy policies of the advertisers whose ads you may choose to click while on our Services.

#### **10. Changes to this Privacy Notice.**

This Privacy Notice is effective as of the date stated at the start of this Privacy Notice. We reserve the right to modify this Privacy Notice at any time. If we modify the Privacy Notice, we will update the date the Privacy Notice was last revised at the start of this Privacy Notice, so please review it frequently. If we make material changes to this Notice, we will notify you by email or by means of a more prominent notice to you.

#### **11. How to Contact Us.**



The Wills Group welcomes your inquiries and comments. If you have questions, concerns, or complaints about this Privacy Notice or our information practices, or if you would like to exercise your privacy rights, please contact us by sending an email to [contactme@willsgroup.com](mailto:contactme@willsgroup.com).