### PRIVACY POLICY

Last Updated: October 24, 2025

Zoomin Groomin USA ("we," "our," or "us") values and respects your privacy. This Policy explains how we collect, use, and share information when you interact with us or use our services online or in person, including when you visit or use one of our franchised locations (collectively, the "Services").

Our franchisees are independently owned and operated. However, when they collect information in connection with the Services, that information is shared with us and governed by this Policy. Some franchisees may also provide their own privacy notices, which supplement, but do not replace, this Policy.

By interacting with a franchised location or providing information to a franchisee, you agree that your information may be collected, shared, and processed according to this Policy, along with any supplemental notices.

The Zoomin Groomin family of brands includes our parent company, Loyalty, LLC and all affiliated Loyalty Brands, including ATAX LLC, Coopers Scoopers LLC, Loyalty Brokers LLC, Loyalty Business Services LLC, Purely Pet LLC, Tectum Franchising LLC, The Inspection Boys Franchise USA LLC, and Whole PM Holdings LLC, and other affiliated entities, which may operate under additional trade names (the "Loyalty Brands"). The entity responsible for your information depends on the services you use and the entity with which you interact.

#### **Information We Collect:**

In the past 12 months, we have collected the following categories of personal information and have shared the personal information with the following categories of third parties for the stated purposes:

Category and	Categories of Third Parties and	Categories of
Examples of	Business Purpose for Disclosure	Third Parties
Information We		and Purposes of
Collect		Sale/Sharing
Identifiers:	Our Franchisees to deliver our products or	Our franchisee,
Your name, alias, postal	services and marketing purposes	Loyalty Brands,
address, Internet		and Loyalty
Protocol address, email	Loyalty Brands and franchisees of Loyalty	Brands'
address, account name,	Brands to provide relevant offers and	franchisees for
Social Security number,	services	joint marketing
driver's license number,		
passport number, or	Service providers who help us run our	Other Third
other similar identifiers	business or improve our services, such as	parties
	background check providers, IT services,	approved by you
	payment processors, marketing agencies,	
	website hosts, analytic tools	

Category and Examples of Information We Collect	Categories of Third Parties and Business Purpose for Disclosure	Categories of Third Parties and Purposes of Sale/Sharing
	Legal authorities and consultants to help prevent fraud, maintain security, comply with applicable laws, and enforce our agreements	
	Other Third parties approved by you	
Personal Information: Name, signature, Social Security	Our Franchisees to deliver our products or services and marketing purposes  Loyalty Brands and franchisees of Loyalty	Our franchisee, Loyalty Brands, and Loyalty Brands'
number, address, telephone number, passport number,	Brands to provide relevant offers and services	franchisees for joint marketing
driver's license or state identification card number, insurance policy number, education, employment,	Service providers who help us run our business or improve our services, such as background check providers, IT services, payment processors, marketing agencies, website hosts, analytic tools	Other Third parties approved by you
employment history, bank account number, credit card number, debit card number, or any other financial information	Legal authorities and consultants to help prevent fraud, maintain security, comply with applicable laws, and enforce our agreements  Other Third parties approved by you	
Legally protected classifications: Military or Veteran Status	Our Franchisees to deliver our products or services and marketing purposes  Loyalty Brands and franchisees of Loyalty Brands to provide relevant offers and services	Our franchisee, Loyalty Brands, and Loyalty Brands' franchisees for joint marketing
	Service providers who help us run our business or improve our services, such as background check providers, IT services, marketing agencies, website hosts, analytic tools	Other Third parties approved by you
	Legal authorities and consultants to help prevent fraud, maintain security, comply with applicable laws, and enforce our agreements	
	Other Third parties approved by you	

Category and Examples of Information We Collect	Categories of Third Parties and Business Purpose for Disclosure	Categories of Third Parties and Purposes of Sale/Sharing
Commercial	Our Franchisees to deliver our products or	Our franchisee,
information:	services and marketing purposes	Loyalty Brands,
Products or services		and Loyalty
purchased, obtained,	Loyalty Brands and franchisees of Loyalty	Brands'
or considered, or	Brands to provide relevant offers and	franchisees for
other purchasing or consuming histories	services	joint marketing
or tendencies	Service providers who help us run our	Other Third
	business or improve our services, such as	parties
	background check providers, IT services,	approved by
	payment processors, marketing agencies,	you
	website hosts, analytic tools	
	Legal authorities and consultants to help	
	prevent fraud, maintain security, comply	
	with applicable laws, and enforce our	
	agreements	
	Other Third parties approved by you	
Internet or Network	Our Franchisees to deliver our products or	Our franchisee,
Information:	services and marketing purposes	Loyalty Brands,
Browsing history,		and Loyalty
search history,	Loyalty Brands and franchisees of Loyalty	Brands'
information on a	Brands to provide relevant offers and	franchisees for
consumer's interaction with an internet	services	joint marketing
with an internet website, application, or	Service providers who help us run our	Other Third
advertisement, your	business or improve our services, such as	parties
computer and mobile	background check providers, IT services,	approved by
device information	payment processors, marketing agencies,	you
	website hosts, analytic tools	
	Legal authorities and consultants to help	
	prevent fraud, maintain security, comply	
	with applicable laws, and enforce our	
	agreements	
	Other Third parties approved by you	
Geolocation data:	Our Franchisees to deliver our products or	Our franchisee,
Data about the location of your	services and marketing purposes	Loyalty Brands, and Loyalty
device	Loyalty Brands and franchisees of Loyalty	Brands'
de vice	Brands to provide relevant offers and	franchisees for
	services	joint marketing

Category and Examples of Information We Collect	Categories of Third Parties and Business Purpose for Disclosure	Categories of Third Parties and Purposes of Sale/Sharing
	Service providers who help us run our business or improve our services, such as background check providers, IT services, payment processors, marketing agencies, website hosts, analytic tools  Legal authorities and consultants to help prevent fraud, maintain security, comply with applicable laws, and enforce our agreements	Other Third parties approved by you
	Other Third parties approved by you	
Audio, electronic, visual, or similar information or recordings.	Our Franchisees to deliver our products or services and marketing purposes  Loyalty Brands and franchisees of Loyalty Brands to provide relevant offers and services	Our franchisee, Loyalty Brands, and Loyalty Brands' franchisees for joint marketing
	Service providers who help us run our business or improve our services, such as background check providers, IT services, payment processors, marketing agencies, website hosts, analytic tools	Other Third parties approved by you
	Legal authorities and consultants to help prevent fraud, maintain security, comply with applicable laws, and enforce our agreements	
Professional or	Other Third parties approved by you  Our Franchisees to deliver our products or	Our franchisee,
employment-related information:	services and marketing purposes	Loyalty Brands, and Loyalty
Current or past job history	Loyalty Brands and franchisees of Loyalty Brands to provide relevant offers and services	Brands' franchisees for joint marketing
	Service providers who help us run our business or improve our services, such as background check providers, IT services, payment processors, marketing agencies, website hosts, analytic tools	Other Third parties approved by you

Category and Examples of Information We Collect	Categories of Third Parties and Business Purpose for Disclosure	Categories of Third Parties and Purposes of Sale/Sharing
	Legal authorities and consultants to help prevent fraud, maintain security, comply with applicable laws, and enforce our agreements  Other Third parties approved by you	
Inferences drawn from other personal information: Preferences, interests, and other characteristics related to consumer trends	Our Franchisees to deliver our products or services and marketing purposes  Loyalty Brands and franchisees of Loyalty Brands to provide relevant offers and services  Service providers who help us run our business or improve our services, such as background check providers, IT services, payment processors, marketing agencies, website hosts, analytic tools  Legal authorities and consultants to help prevent fraud, maintain security, comply with applicable laws, and enforce our agreements  Other Third parties approved by you	Our franchisee, Loyalty Brands, and Loyalty Brands' franchisees for joint marketing  Other Third parties approved by you
Sensitive personal information: Social security, driver's license, state identification card, or passport number; precise geolocation; the contents of mail, email, and text messages unless the business is the intended recipient of the communication	Our Franchisees to deliver our products or services and marketing purposes  Loyalty Brands and franchisees of Loyalty Brands to provide relevant offers and services  Service providers who help us run our business or improve our services, such as background check providers, IT services, payment processors, marketing agencies, website hosts, analytic tools  Legal authorities and consultants to help prevent fraud, maintain security, comply with applicable laws, and enforce our agreements	Our franchisee, Loyalty Brands, and Loyalty Brands' franchisees for joint marketing  Other Third parties approved by you

Category and	Categories of Third Parties and	Categories of
Examples of	Business Purpose for Disclosure	Third Parties
Information We		and Purposes of
Collect		Sale/Sharing
	Other Third parties approved by you	
Pet Information:	Our Franchisees to deliver our products or	Our franchisee,
Pet names; species;	services and marketing purposes	Loyalty Brands,
breeds; gender; pet		and Loyalty
dates of birth and sex;	Loyalty Brands and franchisees of Loyalty	Brands'
weight, veterinary	Brands to provide relevant offers and	franchisees for
name, vaccines, health	services	joint marketing
issues, pet photos that		
you upload, send to, or	Service providers who help us run our	Other Third
share with us;	business or improve our services, such as	parties
microchip information	background check providers, IT services,	approved by you
	payment processors, marketing agencies,	
	website hosts, analytic tools	
	,	
	Legal authorities and consultants to help	
	prevent fraud, maintain security, comply	
	with applicable laws, and enforce our	
	agreements	
	Other Third parties approved by you	

# **How We Collect Information:**

We collect information from the following sources:

- Directly from you- In person, by telephone, text, or email, through our websites when you visit our website, submit an inquiry, schedule services, request information about our services or owning a franchise, sign up for updates, or contact customer service.
- Franchisees- When you sign up for services.
- Loyalty Brands- When you express an interest in our services or owning a franchise.
- Third Parties- From marketing and advertising providers, advertising networks, data analytics providers, social media networks, franchise and business brokers, other third parties with your consent, and from third parties to verify the information you provide.
- Cookies, digital devices, and automated means- We use cookies, tags, web beacons, and other third-party tools and technologies to collect information about your preferences, behavior, and activities. We collect information through your computer, mobile device, or other technology, such as when you visit our websites or click on advertisements or links in emails you receive from us, and automated monitoring of our websites and other technical systems, such as our computer networks and connections, email, and instant messaging systems.

#### Why We Collect Your Information:

We use personal information to:

• Respond to your requests, inquiries, comments, and concerns.

- Short-term, transient use, such as non-personalized advertising shown as part of your current interaction with us.
- Perform our services or take steps at your request, including providing information, customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, processing franchise applications, providing financing, notifying you about changes, updates, offers, and announcements, or providing a similar service on behalf of the business or service provider.
- Providing advertising and marketing services, including targeted advertising.
- Undertaking activities to verify or maintain our services' quality, safety, and security, and to improve, upgrade, or enhance the services.
- Operational reasons, such as improving efficiency, training, quality control, and fraud prevention.
- To comply with our legal and regulatory obligations, resolve disputes, and enforce our agreements.

# Use or Disclosure of Sensitive Personal Information:

We do not use or disclose sensitive personal information for purposes outside the ones listed below:

- To perform the services or provide goods you reasonably expect.
- To prevent, detect, or investigate security incidents that threaten stored or transmitted information.
- To resist malicious, deceptive, fraudulent, or illegal actions and prosecute those responsible.
- To ensure the physical safety of individuals.
- For short-term, transient use (e.g., non-personalized advertising shown during your current interaction) without sharing it externally.
- To verify or maintain the quality or safety of a product, service, or device we control.
- To collect or process sensitive personal information where the purpose is not to infer characteristics about you.

### **How We Protect Your Information**

We take reasonable measures to protect your personal information from unauthorized access, alteration, disclosure, or destruction. Our website utilizes Secure Socket Layer (SSL) encryption, which you can verify by checking for the "https" protocol and the padlock icon in your browser's address bar.

We keep your personal information only as long as necessary to provide our services, complete transactions, comply with legal obligations, maintain records, resolve disputes, ensure security, prevent fraud, and enforce agreements. In some cases, this may mean retaining information indefinitely, even after you are no longer a customer.

While we work to protect your information, no method of transmitting or storing data online is entirely secure. We cannot guarantee the security, integrity, or privacy of information exchanged over the Internet.

# Your Privacy Rights:

Applicable state privacy laws may give you certain rights regarding your personal information. These rights include:

Right to Know-You can request information about:

- The categories of personal information we collected about you.
- The sources for the personal information we collected about you.
- The business or commercial purpose for collecting or selling personal information.
- The categories of third parties with whom we share personal information.
- The specific pieces of personal information we have collected about you.

**Right to Delete-**You may request that we delete personal information we have collected from you. Where required by law, we will:

- Delete your personal information from our records;
- Instruct any service providers or contractors to delete your personal information from their records; and
- Tell third parties with whom we have sold or shared your personal information to delete it unless doing so is impossible or requires disproportionate effort.

We may keep your personal information if it is reasonably necessary to:

- Complete a transaction, provide a good or service you requested, or fulfill a contract with you;
- Meet warranty obligations, recalls, or other legal requirements;
- Detect and repair errors, security, or integrity issues;
- Exercise a right provided for by law;
- Use internally in ways that are consistent with your relationship with us; or
- Comply with legal obligations.

**Right to Correct**-You have the right to request the correction of inaccurate personal information. We will use commercially reasonable efforts to correct it.

**Right to Data Portability-**You have the right to request a copy of your personal information in a portable machine-readable format.

**Right to opt out** of the sale or sharing of your personal information for targeted advertising or advertising based on your activity across different websites or apps. You also have the right to opt out of any automated profiling used to make decisions that could have legal or similarly significant effects on you.

**Right to limit the use or disclosure** of your sensitive personal information for reasons other than those in this Privacy Policy under the heading "Use or Disclosure of Sensitive Personal Information."

**Right not to receive discriminatory treatment** for exercising any of these rights. This means we will not:

- Deny you goods or services;
- Charge you different prices or rates, including discounts or imposing penalties;
- Provide you with a different level or quality of goods or services; or
- Suggest you will receive different prices or level or quality of goods or services.

We may, however, charge different prices, services, or benefits if reasonably related to the value of your personal information to our business. We may also offer loyalty, rewards, premium features, or discounts as compensation for collecting, selling, or retaining personal information.

# **How to Exercise Your Privacy Rights:**

You can request to access, correct, or delete your personal information by emailing **support@zoomingroomin.com**. Please include your name, address, phone number, email, and the specific right you want to exercise. We generally do not charge a fee to process requests. However, if a request is excessive, repetitive, or unfounded, we may charge a reasonable fee for processing it. You may make up to two requests in any 12-month period. If fees apply, we will notify you in advance.

#### Verification

To protect your information, we must verify your identity before processing a request. This may require proof of identity or address and answering questions about yourself. Authorized agents must provide their contact information, a signed certification, and details about the consumer they represent. Parents or guardians may submit requests on behalf of their children. If we cannot verify your identity or authority, we may decline your request. Any information collected for verification will only be used for that purpose.

Response Timing and Appeals

We will respond within 45 days of receiving your request. If more time is needed due to the complexity of your request, we may extend our response time by an additional 45 days and will notify you within the initial period. If we deny your request, we will notify you within 45 days and provide information on how to appeal, if available.

### Opt out of Sale or Sharing of Personal Information:

We process personal data for the purposes of targeted advertising. You have the right to opt out of that sale or processing.

To opt out of the sale or sharing of your personal information for cross-contextual behavioral advertising or targeted advertising, send an email requesting to opt out to support@zoomingroomin.com and provide us with your name, address, phone number, and email.

#### California's Shine the Light Law

California residents may request, once per year, information about personal information we shared with other businesses for their marketing purposes. If applicable, this will include the types of information shared and the names and addresses of those businesses from the prior calendar year.

To make a request, contact us at **support@zoomingroomin.com** or by mail at: Zoomin Groomin USA, LLC 780 Lynnhaven Pkwy, Suite 240 Virginia Beach, VA 23452

Please include your full name, email, and mailing address.

### <u>Linking to Other Internet Sites:</u>

Our website or emails may include links to other sites we don't operate. These third-party sites may have different privacy practices than ours. To protect your privacy, we recommend reviewing the privacy policies of any site, app, or platform you visit through these links. We don't control—and aren't responsible for—the privacy practices of these third parties.

# Children's Privacy:

Our Services are not intended for anyone under 18. We do not knowingly collect, sell, or share personal information from anyone under 16. If you're a parent or guardian and believe your child has shared personal information with us, please contact us. If we discover that we've collected information from children without their parents' consent, we take steps to delete it from our systems.

### **Visitors from Outside of the United States**

Our Services are provided in the United States. If you submit Personal Information from a location outside of the U.S., your Personal Information will be maintained on web servers and systems located within the U.S. The data protection laws in the United States may differ from those in the country where you are located, and your information may be subject to access requests from governments, courts, or law enforcement agencies in the United States, as governed by U.S. laws.

# Mergers & Acquisitions:

If our business undergoes a transition—such as a merger, acquisition, sale, or liquidation—your information may be part of the assets that are transferred or shared during the process. Even if this happens, the new company will still follow this Privacy Policy. If the way your information is used changes significantly, we'll notify you.

# **Changes to the Privacy Policy:**

We reserve the right to update this Privacy Policy from time to time. When we do, the new version will be posted here with the date it was updated. We encourage you to check this page occasionally. By continuing to use our Services after these updates, you agree to the changes.

#### **Contact Us:**

For any questions or concerns regarding our Privacy Policy and information practices, please contact us at support@zoomingroomin.com.