

## IMPORTANT ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

Last Updated: December 16, 2019

This section provides information for California residents, as required under California privacy laws, including the California Consumer Privacy Act ("CCPA"). California privacy laws require that we provide California residents information about how we use their personal information, whether collected online or offline, and this section is intended to satisfy that requirement.

Under the CCPA, "personal information" is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household.

### **Categories of Personal Information that We Collect, Disclose, and Sell**

Below please find the categories of personal information about California residents that we collect, sell, and/or disclose to third parties or service providers for a business purpose.

**NAME, CONTACT INFORMATION AND IDENTIFIERS:** Identifiers such as a real name, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address and email address.

- Do we collect? YES
- Do we disclose for business purposes? YES
- Do we sell? YES

**CUSTOMER RECORDS:** Paper and electronic customer records containing personal information, such as name, address, telephone number, credit card number and debit card number.

- Do we collect? YES
- Do we disclose for business purposes? YES
- Do we sell? NO

**PROTECTED CLASSIFICATIONS:** Characteristics of protected classifications under California or federal law such as sex and age. Any "sale" (as defined under the CCPA) of information under this category is for the purpose of enabling users to register accounts and preventing children from using certain websites, apps and services without first receiving parental consent.

- Do we collect? YES
- Do we disclose for business purpose? YES
- Do we sell? YES

**PURCHASE HISTORY AND TENDENCIES:** Commercial information, including products or services purchased, obtained, or considered.

- Do we collect? YES

- Do we disclose for business purposes? YES
- Do we sell? NO

BIOMETRIC INFORMATION: Physiological, biological or behavioral characteristics that can be used alone or in combination with each other to establish individual identity, including DNA, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.

- Do we collect? NO
- Do we disclose for business purposes? NO
- Do we sell? NO

USAGE DATA: Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a resident's interaction with an internet website, application, or advertisement.

- Do we collect? YES
- Do we disclose for business purposes? YES
- Do we sell? YES

GEOLOCATION DATA: Precise geographic location information about an individual or device.

- Do we collect? NO
- Do we disclose for business purposes? NO
- Do we sell? NO

AUDIO/VISUAL: Audio, electronic, visual information, such as photos and videos. Some of our websites allow users to create and upload content themselves. Whenever an activity could potentially allow a user to share Audio/Visual information, we either review the content ourselves and make sure personal information is removed or, if a child shared the content, we ask for permission from a parent or guardian to collect the data. Any "sale" (as defined under the CCPA) of this information is for the purpose of monitoring these activities and preventing this category of information from being made public.

- Do we collect? YES
- Do we disclose for business purposes? YES
- Do we sell? YES

EMPLOYMENT HISTORY: Professional or employment-related information.

- Do we collect? NO
- Do we disclose for business purposes? NO
- Do we sell? NO

EDUCATION INFORMATION: Information that is not publicly available personally identifiable information as defined in the federal Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).

- Do we collect? NO
- Do we disclose for business purposes? NO
- Do we sell? NO

PROFILES AND INFERENCES: Inferences drawn from any of the information identified above to create a profile about a resident reflecting the resident's preferences, characteristics or behavior.

- Do we collect? YES
- Do we disclose for business purposes? YES
- Do we sell? NO

### **California Residents' Rights**

California law grants California residents certain rights and imposes restrictions on particular business practices as set forth below.

**Right to Opt-out.** California residents have the right to opt-out of our sale of their personal information. Opt-out rights can be exercised by visiting our Cookie Policy or by going directly to our Cookie Settings page and deleting or preventing cookies from being used. You can also click on the "Do Not Sell My Data" link at the bottom of every webpage.

**Right to Opt-In.** We do not sell personal information about residents who we know are younger than 16 years old without verifiable parental consent.

**Notice at Collection:** We are required to notify California residents, at or before the point of collection of their personal information, the categories of personal information collected and the purposes for which such information is used.

**Verifiable Requests to Delete, Requests to Know.** Subject to certain exceptions, California residents have the right to make the following requests, at no charge, up to twice every 12 months:

Right of Deletion: California residents have the right to request deletion of their personal information that we have collected about them, subject to certain exemptions, and to have such personal information deleted, except where necessary that we maintain such personal information in order to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by the California resident, or reasonably anticipated within the context of a business's ongoing business relationship with the California resident, or otherwise perform a contract between the business and the California resident.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another California resident to exercise his or her right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to

Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.

- 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 the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the California resident has provided informed consent.
- Enable solely internal uses that are reasonably aligned with the expectations of the California resident based on the consumer's relationship with the business.
- Comply with a legal obligation.
- Otherwise use the California resident's personal information, internally, in a lawful manner that is compatible with the context in which the California resident provided the information.

**Right to Know – Right to a Copy:** California residents have the right to request a copy of the specific pieces of personal information that we have collected about them in the prior 12 months and to have this delivered, free of charge, either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily useable format that allows the individual to transmit this information to another entity without hindrance.

**Right to Know - Information:** California residents have the right to request that we provide them certain information about how we have handled their personal information in the prior 12 months, including the:

- categories of personal information collected;
- categories of sources of personal information;
- business and/or commercial purposes for collecting and selling their personal information;
- categories of third parties/with whom we have disclosed or shared their personal information;
- categories of personal information that we have disclosed or shared with a third party for a business purpose;
- categories of personal information collected; and
- categories of third parties to whom the residents' personal information has been sold and the specific categories of personal information sold to each category of third party.

**Submitting Requests.** Requests to exercise the right of deletion, right to a copy, and / or the right to know may be submitted by contacting us at 1-800-835-4386 (toll free) or by emailing us at [privacy.officer@lego.com](mailto:privacy.officer@lego.com). We will respond to verifiable requests received from California consumers as required by law.

**Right to Non-Discrimination and Incentives.** The CCPA prohibits discrimination against California residents for exercising their rights under the CCPA and imposes requirements on any financial incentives offered to California residents related to their personal information.

**Discrimination:** Businesses may not discriminate against residents who exercise their rights under CCPA. Discrimination may exist where a business denies or provides a different level or quality of goods or services, or charges (or suggests that it will charge) different prices or rates or impose penalties on residents who exercise their CCPA rights, unless doing so is reasonably related to the value provided to the business by the residents' data.

**Disclosure of Incentives:** If businesses offer any financial incentives for the collection, sale or deletion of California residents' personal information, residents have the right to be notified of any financial incentives offers and their material terms, the right not be included in such offers without prior informed opt-in consent, and the right to be able to opt-out of such offers at any time. Businesses may not offer unjust, unreasonable, coercive or usurious financial incentives.

### **California Privacy Rights under California's Shine-the-Light Law**

Under California's "Shine the Light" law (Cal. Civ. Code § 1798.83), California residents who provide us certain personal information are entitled to request and obtain from us, free of charge, information about the personal information (if any) we have shared with third parties for their own direct marketing use. Such requests may be made once per calendar year for information about any relevant third party sharing in the prior calendar year. California residents who would like to make such a request may submit a request in writing to [privacy.officer@LEGO.com](mailto:privacy.officer@LEGO.com). The request should attest to the fact that the requester is a California resident, and provide a current California address.