

FASMART

Mobile App Privacy Policy

Last modified: Mar 27, 2023

Introduction

GPM Investments LLC (“**Company**” or “**We**”) respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes:

The types of information we may collect or that you may provide when you download, register with, access, and/or use the FASMART app (the “**App**”).

Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies only to information we collect in this App and in email, text, and other electronic communications sent through or in connection with this App.

This policy DOES NOT apply to information that:

We collect offline or on any other Company apps or websites, including websites you may access through this App.

You provide to or is collected by any third party (see Third-Party Information Collection).

Our websites and apps, and these other third parties have their own privacy policies, which we encourage you to read before providing information on or through them.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not download, register with, or use this App. By downloading, registering with, or using this App, you agree to this privacy policy. This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this App after we revise this policy means you accept those changes, so please check the policy periodically for updates.

Children Under the Age of 18

The App is not intended for children under 18 years of age, and we do not knowingly collect personal information from children under 18. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at fasREWARDS@gpminvestments.com.

Information We Collect and How We Collect It

We collect information from and about users of our App:

Directly from you when you provide it to us.

Automatically when you use the App.

Any other?

Information You Provide to Us

When you download, register with, or use this App, we may ask you provide information:

By which you may be personally identified, such as name, postal address, email address, telephone number, or any other identifier by which you may be contacted online or offline (“**personal information**”).

That is about you but individually does not identify you, such as gender, age, etc.

This information includes:

Information that you provide by filling in forms in the App. This includes information provided at the time of registering to use the App, creating an account and requesting products and/or

services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with the App.

Records and copies of your correspondence (including email addresses and phone numbers), if you contact us.

Your responses to surveys that we might ask you to complete for research purposes.

Details of transactions you carry out through the App and of the fulfillment of your orders. You may be required to provide financial information before placing an order through the App.

Your search queries on the App.

Automatic Information Collection and Tracking

When you download, access, and use the App, it may use technology to automatically collect:

Device Information. We may collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.

Usage Details. When you access and use the App, we may automatically collect certain details of your access to and use of the App, including traffic data, location data, logs, and other communication data and the resources that you access and use on or through the App.

Location Information. This App collects real-time information about the location of your device through the GPS function on your mobile device as well as through cell phone towers triangulation and Wi-Fi signals.

Stored Information and Files. The App may also access metadata and other information associated with other files stored on your device.

If you do not want us to collect this information: (i) do not download the App, (ii) delete it from your device, or (iii) choose not to share your location. Note, however, that opting out of the App's collection of location information will disable its location-based features.

Information Collection and Tracking Technologies

The technologies we use for automatic information collection may include:

Cookies (or mobile cookies). A cookie is a small file placed on your smartphone. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your smartphone. However, if you select this setting you may be unable to access certain parts of our App.

Web Beacons. Pages of the App may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages and for other related app statistics (for example, recording the popularity of certain app content and verifying system and server integrity).

[OTHER TECHNOLOGIES].

Third-Party Information Collection

When you use the App or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

Advertisers, ad networks, and ad servers.

Analytics companies.

Your mobile device manufacturer.

Your mobile service provider.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information, to:

Provide you with the App and its contents, and any other information, products or services that you request from us.

Fulfill any other purpose for which you provide it.

Give you notices about your account including expiration and renewal notices.

Carry out our obligations and enforce our rights arising from any agreements entered into between you and us, including for billing and collection.

Notify you when App updates are available, and of changes to any products or services we offer or provide through it.

The usage information we collect helps us to improve our App and to deliver a better and more personalized experience by enabling us to:

Estimate our audience size and usage patterns.

Store information about your preferences, allowing us to customize our App according to your individual interests.

Speed up your searches.

Recognize you when you use the App.

We use location information we collect to determine whether you are in range to order from one of our stores and to help you determine the store closest to you.

We may also use your information to contact you about our own and third parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please check the relevant box located on the form on which we collect your data (the account creation form) or adjust your user preferences in your account profile.

We may use the information we collect to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual or device, without restriction.

In addition, we may disclose personal information that we collect or you provide:

To our subsidiaries and affiliates.

To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.

To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by GPM Investments LLC about our App users is among the assets transferred.

To third parties to market their products or services to you if you have consented to/not opted out of these disclosures. We contractually require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them.

To fulfill the purpose for which you provide it.

For any other purpose disclosed by us when you provide the information.

With your consent.

To comply with any court order, law, or legal process, including to respond to any government or regulatory request.

To enforce our rights arising from any agreements entered into between you and us, including the App EULA, terms of sale, and for billing and collection.

If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers or others.

Your Choices About Our Collection, Use, and Disclosure of Your Information

We strive to provide you with choices regarding the personal information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of your information.

Tracking Technologies. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the App may be inaccessible or not function properly.

Location Information. You can choose whether or not to allow the App to collect and use real-time information about your device's location through the device's privacy settings or when asked. If you block the use of location information, some parts of the App may become inaccessible or not function properly.

Promotion by the Company. If you do not want us to use your contact information, including your email address, to promote our own or third parties' products or services, you can opt-out by logging into the App and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to _____.

Targeted Advertising by the Company. If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by adjusting your user advertising preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to _____.

Disclosure of Your Information for Third-Party Advertising and Marketing. If you do not want us to share your personal information with unaffiliated or non-agent third parties for advertising and marketing purposes, you can opt-out by logging into the App and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to _____.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. For example, you can opt out of receiving certain targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website. Residents in certain states, such as Virginia, may have additional personal information rights and choices. Please see Your State Privacy Rights for more information.

Accessing and Correcting Your Personal Information

You can review and change your personal information by logging into the App and visiting your account profile page.

Residents in certain states, such as Virginia, may have additional personal information rights and choices. Please see Your State Privacy Rights for more information.

Your State Privacy Rights

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about consumer privacy rights in other states and how to exercise them, visit our Privacy Center at _____.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

Changes to Our Privacy Policy

We may update our privacy policy from time to time. The date the privacy policy was last revised is identified at the top of the page.

If we make material changes to how we treat our users' personal information, we will post the new privacy policy on this page with a notice that the privacy policy has been updated [and notify you by email to the primary email address] specified in your account. You are responsible for ensuring we have an up-to-date active and deliverable email address for you and for periodically visiting this privacy policy to check for any changes.

[We will also provide an in-App alert the first time you use the App after we make the change].

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:
_____.

[or via our toll-free number:
[TOLL-FREE NUMBER]]