

## IMPORTANT ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

Last Updated: November 10, 2022

This section provides information for California residents, as required under California privacy laws, including the California Consumer Privacy Act, as amended (“CCPA”). California privacy laws require that we provide California residents information about how we use their personal information, 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. Personal information does not include publicly available information, deidentified information, aggregate consumer information or other exclusions under applicable law.

### **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? YES

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

AUDIO/VISUAL: Audio, electronic, thermal, 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.

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

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. Online opt-out rights can be exercised by visiting our Cookie Policy for global privacy control options 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 Personal Information" 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

**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). Requests can also be exercised through the Do Not Sell My Personal Information link in the footer of the websites.

**Right to Non-Discrimination:** We will 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.

**Rights to Disclosure of Financial Incentives:** You have the right to opt-in to any financial incentives offers and be notified of their material terms, 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.

#### **Notice of Financial Incentive:**

LEGO VIP is a voluntary loyalty program, which may be considered a financial incentive program under California law. Term and conditions of the LEGO VIP Program are available at <https://www.lego.com/en-us/vip/terms>.

**The LEGO VIP Program:** If you're at least 18 years old, you can join the LEGO VIP Program. VIP Members can collect VIP points by shopping in stores or online. You can also earn points by filling out surveys, watching videos, visiting our Facebook page or referring a friend. Points can be redeemed for discounts on future purchases, exclusive rewards,

promotions and events. Our VIP Members also get special early access to select new items. When you sign up for the LEGO VIP Program, you'll receive a digital card that you can download to your smart phone.

### **Opting-In to the LEGO VIP Program:**

- Online: You can opt-in to the LEGO VIP Program at any time. Simply sign up through VIP.LEGO.com and then follow the instructions to register. After you sign up, you'll receive a welcome email and your digital card.
- Phone: If you contact us, we can sign you up. Once we've got the details we need, we'll send you a welcome email with instructions for registering your account. You'll need to complete the registration to receive and start using your digital card.
- LEGO Stores: If you drop by one of our LEGO Stores, you can become a LEGO VIP member right there and then. Just ask one of our Brick Specialists to sign you up, and they'll be happy to help. After you sign up in-store, you'll receive a welcome email with instructions for completing your registration. After your registration is complete, you'll receive an email with a link to your new digital card.

**Withdrawing From the Financial Incentive Program:** You may terminate or cancel your VIP Membership at any time as follows:

- Online via our chatbot: <https://www.lego.com/en-us/service>,
- Online: <https://www.lego.com/en-us/service/email-us/details/LEGO%20VIP/Cancel%20Membership>
- Phone: LEGO Group via Customer Service via phone 1-844-903-5346 (Customer Service in English) or 1-833-692-5346 (Customer Service in Spanish)
- Mail: LEGO® Customer Service; PO Box 1138; Enfield, CT 06083-1138, USA. When contacting Customer Service, you will be asked security questions relating to your VIP Account to verify that you are the owner of the VIP Account.

### **Categories of Personal Information We Collect for the VIP Program**

In order to provide you with the incentives described in the Terms & Conditions, the LEGO Group uses personal information about you including your *Name, Contact Information and Identifiers* (specifically, full name, postal address, valid email address and phone number, country and region of residence, date of birth, and LEGO ID, etc.); *Customer Records* (specifically, points earn activities, points redemption activities, coupon/code redemption, download activities, etc.); *Purchase History and Tendencies* (specifically, purchase history, participation in promotional events such as sale, gift with purchase, bonus points periods, early access, etc.); and *Profiles and Inferences* (specifically, survey and polling responses; participation in activities, games, apps, and events; theme, product and category preferences; product registration, etc.).

We may disclose your personal information and/or make it available to other members of the LEGO Group, store operators, our suppliers and/or service providers in connection with the general operation of the VIP Program, e.g., maintenance of the VIP Program, analysis and marketing tasks, general operational requirements, etc. We may process your personal information in a de-identified, aggregated, or pseudonymized form for the purposes of management, further development, marketing of the VIP Program and general reporting and analysis.

## **Summary of Terms and Estimate of Value and Methods**

As more fully described in the Terms & Conditions at <https://www.lego.com/en-us/vip/terms>, points may be earned for a qualifying purchase of a LEGO product in a LEGO store, on LEGO.com and in participating stores at LEGOLAND® Parks and LEGOLAND® Discovery Centers.

Qualifying purchases are defined as any service or merchandise available for purchase, excluding gift cards. LEGO VIP Members may also earn points in other ways as specifically communicated by LEGO Group in emails or online postings from time to time. LEGO Group may also, at its sole and absolute discretion, award 'bonus' points for certain actions (such as early enrollment or frequent activity). Additional rules and restrictions may apply to such bonus point promotions, which are explained more specifically at the time of the promotion.

Points can be used only for the purposes expressly specified in the Terms & Conditions or as set out more specifically in the terms for rewards, promotional offers or activities that are offered from time to time.

While points have no cash value, we have estimated in good faith in the United States that 6.5 points is equivalent to \$0.05. The basis of calculation for the VIP Program is points that are credited to the Members' VIP Account. The method for calculating the Points is the same globally, but the number of points a VIP Member may earn on the purchase of a particular product will differ from country to country, as the price will be different. The points and awards allotment principles can be found at <https://www.lego.com/en-us/vip> and will be updated from time to time.

The expenses associated with the program incentives will vary as it is dependent on your engagement with the VIP Program, including the amount of products you purchase, your interactions with or answers to certain VIP Member Program questions and the frequency and type of discounts you choose to use.

We reserve the right to make special rewards or promotional offers or activities available to groups of VIP Members based on their program activity, including, but not limited to, points status and history, country of residence, shopper history/product preferences and rewards history. The terms and conditions for such special rewards or promotional offers/activities, and the nature, scope, duration and availability of such special rewards or promotional offer/activities will be presented with the offer/activity and may differ from time to time.

**Third Party Programs:** Please note that some rewards or promotions or offers are delivered and operated by independent third parties to the LEGO Group and may be subject

to separate privacy conditions and may ask for separate consent of use of your personal information. LEGO Group will inform you that you are leaving the LEGO platform/website. Please make sure that you read those terms and conditions carefully before agreeing.