

## VALVOLINE CONSUMER PRIVACY NOTICE

Effective Date: October 1, 2024

Last Updated: October 1, 2024

At Valvoline we believe that it all starts with people which is why we take the job of protecting personal information seriously. As a provider of instant oil changes, Valvoline brings "Hands-On-Expertise" and the industry's best service model. We work as part of a team, geared to enable our corporate stores, franchisees, and business partners to have the resources necessary to ensure safety and customer satisfaction, while saving our customers time and money.

This Privacy Notice ("Notice") describes the data practices of Valvoline, our subsidiaries, and affiliates (collectively, "Valvoline," "we," "us," or "our"), on our Offline Services and Online Services where this Notice is posted. This Notice also applies to "Consumers" as defined under applicable states consumer privacy laws, such as the California Consumer Privacy Act, including as amended by the California Privacy Rights Act (together, the "CCPA"), the Colorado Privacy Act, the Virginia Consumer Data Protection Act, the Utah Consumer Privacy Act, Connecticut's Act Concerning Personal Data Privacy and Online Monitoring, the Texas Data Privacy and Security Act, Chapter 603A of the Nevada Revised Statutes, the Montana Consumer Data Privacy Act (effective October 1, 2024), the Delaware Personal Data Privacy Act (effective January 1, 2025), the Iowa Consumer Data Protection Act (effective January 1, 2025), the Nebraska Data Privacy Act (effective January 1, 2025), the Oregon Consumer Privacy Act, the New Hampshire Data Privacy Law (effective January 1, 2025), the New Jersey Data Protection Act (effective January 15, 2025), and all laws implementing, supplementing or amending the foregoing, including regulations promulgated thereunder (collectively, "State Privacy Laws").

### ***Applicability:***

- Sections 1 – 13 of this Notice provide notice of our data practices, including our collection, use, and disclosure of Personal Information or Personal Data (collectively, "Personal Information"), as those terms are defined under the State Privacy Laws. The same practices apply to those residents of states without State Privacy Laws.
- Section 14 of this Notice provide information regarding Consumer rights that are available to residents of states with State Privacy Laws and how those Consumers may exercise their rights on or after the effective date of the State Privacy Laws.
- Section 14.E of this Notice provides additional information for California residents.

For California residents with which we interact in a Business-to-Business ("B-to-B") context and in the human resources context ("Personnel"), this Notice does not apply to

you. Please review the [Valvoline California B-to-B and Personnel Privacy Notice](#) to learn about our data practices as relates to you.

The privacy and protection of Personal Information is important to Valvoline. This Notice may change over time. The changes we make to the Notice will become effective upon posting and apply to our privacy practices prospectively.

By accessing or using our products and services, you acknowledge this Notice. The date the Notice was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this Notice to check for any changes.

## **1. Notice of Data Practices**

The description of our data practices in this Notice covers the twelve (12) months prior to the Effective Date or date last updated, whichever is later. Our data practices may differ between updates. However, if materially different from this Notice, we will provide supplemental pre-collection notice of the current practices, which may include references to other privacy policies, notices, or statements. Otherwise, this Notice serves as our notice at collection.

Generally, we process your Personal Information to provide you with our Online Services and Offline Services and as otherwise related to the operation of our business, including for one or more of the following Business Purposes: Performing Services; Managing Interactions and Transactions; Security; Debugging; Advertising & Marketing; Quality Assurance; Processing Interactions and Transactions; and Research and Development. We may also use Personal Information for other Business Purposes in a context that is not a Sale or Share under State Privacy Laws, such as disclosing it to our Service Providers, Contractors, or Processors that perform services for us (“Vendors”); to the Consumer or to other parties at the Consumer’s direction or through the Consumer’s action; for the additional purposes explained at the time of collection (such as in the applicable privacy policy or notice); as required or permitted by applicable law; to the government or private parties to comply with law or legal process or protect or enforce legal rights or obligations or prevent harm; and to assignees as part of an acquisition, merger, asset sale, or other transaction where another party assumes control over all or part of our business (“Corporate Transaction”) (“Additional Business Purposes”). Subject to restrictions and obligations under State Privacy Laws, our Vendors may also use your Personal Information for Business Purposes and Additional Business Purposes and may engage their own vendors to enable them to perform services for us.

We may also use and disclose your Personal Information under this Notice for Commercial Purposes, which may be considered a “Sale” or “Share” under applicable State Privacy Laws, such as when third-party digital businesses collect your Personal Information via third-party cookies, and when we process Personal Information for certain advertising purposes (“Third-Party Digital Businesses”). In addition, we may make your Personal Information available to our Business Partners for their own use.

Valvoline operates in the United States and Canada. Accordingly, your personal information may be processed in a foreign country, where privacy laws may be less stringent than the laws in your country. By submitting your personal information to us you agree to the transfer, storage, and processing of your personal information in a country other than your country of residence including, but not necessarily limited to, the United States. Where we transfer personal information internally within Valvoline or to any third party between different jurisdictions, for the purposes outlined in this document, we will take appropriate steps to ensure that transfers are in accordance with applicable law and carefully managed to protect your privacy rights and interests.

We provide more detail on our data practices in the sections that follow.

## **2. When Does This Privacy Notice Apply?**

This Notice applies to Personal Information we process (i.e., collect, use, store, share, delete, etc.) on our Online Services and Offline Services (collectively, “Services”) from or about you:

- (a) when you access and use our websites or mobile applications, receive or send email or telephone communications or text messages, and other online services (“Online Services”);
- (b) when you use, communicate, or interact with us or our products and services offline (“Offline Services”); and
- (c) from third parties, when disclosed by the third party and processed by us.

## **3. To Whom Does This Privacy Notice Apply?**

This Notice applies to the processing of Personal Information by Valvoline of:

- Visitors and users of Valvoline websites and mobile applications;
- Users of Valvoline services and products;
- Users of our communication platforms;
- Customers and prospective customers and their respective representatives;
- Subscribers to Valvoline’s publications, newsletters, and social media;
- Visitors to Valvoline offices and facilities acting in an individual or household context; and
- Individuals who otherwise interact with Valvoline in person, in writing, or through a third party.

This Notice does not apply to information you provide to third parties including websites, application, and any other third-party interactions which are not held or controlled by

Valvoline. When interacting with our Online Services, you may be able to link or connect with non-Valvoline websites, services, social media networks, applications, or other third-party features. The data practices of these third parties are governed by their own privacy notices, for which Valvoline is not responsible.

#### 4. What Personal Information Do We Collect and Process?

Valvoline collects and processes Personal Information in a variety of contexts. For example, we collect and process Personal Information to provide services and products you have requested, to ensure functionality of our Services, and to contact you.

Within the last 12 months we may have collected the following as described in the below table.

(a) Personal Information Collection, Disclosure, and Retention – By Category of Personal Information

(i) We collect, disclose, and retain the Personal Information of Consumers as follows:

Category of Personal Information	Examples of Personal Information Collected and Retained	Categories of Recipients
1. Identifiers	Full name, address, unique personal identifiers, online identifier, Internet Protocol address, e-mail address, Valvoline account name, Vehicle Identification Number (VIN), vehicle information (year/make/model), and license plate number.	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>Processors (e.g., cloud storage vendors, IT vendors, email/messaging, customer support providers, data analytics and marketing vendors) (“Operational Service Providers”);</li> <li>Other members of our corporate group, our franchisees, and/or other parties in connection with a Corporate Transaction (“Corporate Recipients”);</li> <li>Governmental entities (e.g., making requests pursuant to legal or regulatory process) (“Government”); and/or</li> <li>Other parties (e.g., professional advisors (accountants and lawyers), litigants and where you have directed or caused the</li> </ul>

Category of Personal Information	Examples of Personal Information Collected and Retained	Categories of Recipients
		<p>disclosure) within the limits of Additional Business Purposes (“Other Business Recipients”).</p> <p><b>Sale/Share:</b></p> <ul style="list-style-type: none"> <li>• Third-Party Digital Businesses</li> <li>• Business Partners</li> </ul>
2. Personal Records	<p>Full name, signature, address, telephone number, records of personal and business property, employment information, education information, and financial information (e.g., payment card information). Some Personal Information included in this category may overlap with other categories.</p>	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• Operational Service Providers;</li> <li>• Corporate Recipients;</li> <li>• Government; and/or</li> <li>• Other Business Recipients.</li> </ul> <p><b>Sale/Share:</b></p> <ul style="list-style-type: none"> <li>• Third-Party Digital Businesses</li> <li>• Business Partners</li> </ul>
3. Personal Characteristics or Traits	<p>In some circumstances, we may collect Personal Information that is considered protected under U.S. law, such as veteran status or gender, but only when that information is relevant for our Business Purposes.</p>	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• Operational Service Providers;</li> <li>• Corporate Recipients;</li> <li>• Government; and/or</li> <li>• Other Business Recipients.</li> </ul> <p><b>Sale/Share:</b></p> <p>We do not Sell or Share this information.</p>
4. Customer Account Details/Commercial Information	<p>Records of products or services purchased, obtained, or considered or other purchasing or</p>	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• Operational Service Providers;</li> <li>• Corporate Recipients;</li> <li>• Government; and/or</li> </ul>

Category of Personal Information	Examples of Personal Information Collected and Retained	Categories of Recipients
	consuming histories or tendencies.	<ul style="list-style-type: none"> <li>• Other Business Recipients.</li> </ul> <b>Sale/Share:</b> <ul style="list-style-type: none"> <li>• Third-Party Digital Businesses</li> <li>• Business Partners</li> </ul>
5. Internet Usage Information	When you browse our sites or otherwise interact with us online, we may collect browsing history, search history, and other information regarding your interaction with our sites, applications, or advertisements.	<b>Disclosures for Business Purposes:</b> <ul style="list-style-type: none"> <li>• Operational Service Providers;</li> <li>• Corporate Recipients;</li> <li>• Government; and/or</li> <li>• Other Business Recipients.</li> </ul> <b>Sale/Share:</b> <ul style="list-style-type: none"> <li>• Third-Party Digital Businesses</li> <li>• Business Partners</li> </ul>
6. Geolocation Data	If you interact with us online, we may gain access to the approximate, and sometimes precise, location of the device or equipment you are using.	<b>Disclosures for Business Purposes:</b> <ul style="list-style-type: none"> <li>• Operational Service Providers;</li> <li>• Corporate Recipients;</li> <li>• Government; and/or</li> <li>• Other Business Recipients.</li> </ul> <b>Sale/Share:</b> <ul style="list-style-type: none"> <li>• Third-Party Digital Businesses</li> <li>• Business Partners</li> </ul>
7. Sensory Data	We may collect audio, electronic, or similar information when you interact with us by calling customer service, using our online chat function, voluntarily engaging in reviews or surveys, or visiting our physical locations where CCTV or other video/audio recordings occur.	<b>Disclosures for Business Purposes:</b> <ul style="list-style-type: none"> <li>• Operational Service Providers;</li> <li>• Corporate Recipients;</li> <li>• Government; and/or</li> <li>• Other Business Recipients.</li> </ul> <b>Sale/Share:</b> <ul style="list-style-type: none"> <li>• We do not Sell or Share this Personal Information.</li> </ul>

Category of Personal Information	Examples of Personal Information Collected and Retained	Categories of Recipients
8. Professional or Employment Information	Professional, educational, or employment-related information such as employer, professional affiliations, or work history.	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• Operational Service Providers;</li> <li>• Corporate Recipients;</li> <li>• Government; and/or</li> <li>• Other Business Recipients.</li> </ul> <p><b>Sale/Share:</b></p> <p>We do not Sell or Share this Personal Information.</p>
9. Inferences from Personal Information Collected	Inferences drawn from Personal Information to create a profile about a Consumer that reflects preferences.	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• Operational Service Providers;</li> <li>• Benefits Providers;</li> <li>• Corporate Recipients;</li> <li>• Government; and/or</li> <li>• Other Business Recipients.</li> </ul> <p><b>Sale/Share:</b></p> <p>We do not Sell or Share this Personal Information.</p>
10. Sensitive Personal Information	Government Issued Identification Numbers (e.g., driver's license number).	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• Operational Service Providers;</li> <li>• Corporate Recipients;</li> <li>• Government; and/or</li> <li>• Other Business Recipients.</li> </ul> <p><b>Sale/Share:</b></p> <p>We do not Sell or Share this Personal Information.</p>
	Consumer Health Information (collected in the context of slip-and-fall claims, disability access, etc.).	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• Operational Service Providers;</li> <li>• Corporate Recipients;</li> <li>• Government; and/or</li> </ul>

Category of Personal Information	Examples of Personal Information Collected and Retained	Categories of Recipients
		<ul style="list-style-type: none"> <li>• Other Business Recipients.</li> </ul> <p><b>Sale/Share:</b> We do not Sell or Share this Personal Information.</p>
	<p>Precise Geolocation (any data that is derived from a device and that is used or intended to be used to locate a consumer w/in a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet)</p>	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• Operational Service Providers;</li> <li>• Corporate Recipients;</li> <li>• Government; and/or</li> <li>• Other Business Recipients.</li> </ul> <p><b>Sale/Share:</b></p> <ul style="list-style-type: none"> <li>• Third-Party Digital Businesses</li> <li>• Business Partners</li> </ul>

There may be additional information we collect that meets the definition of Personal Information under applicable State Privacy Laws but is not reflected by a category above, in which case we will treat it as Personal Information, as required, but will not include it when we describe our practices by Personal Information category.

As permitted by applicable law, we do not treat deidentified data or aggregate consumer information as Personal Information and we reserve the right to convert, or permit others to convert, your Personal Information into deidentified data or aggregate consumer information, and we may elect not to treat publicly available information as Personal Information. We will not attempt to reidentify data that we maintain as deidentified.

We retain Personal Information for as long as it is necessary to fulfill the purpose for which it was collected and for as long as we need to retain it to fulfill our legal obligations. There are numerous types of Personal Information in each category, and various uses for each Personal Information type, actual retention periods vary. We retain specific Personal Information pieces based on how long we have a legitimate purpose for the retention and do not retain Personal Information once that purpose has been fulfilled, except as permitted by law.



## 5. How Do We Collect Your Personal Information?

The sources from which we collect Personal Information depend on, among other things, our relationship or interaction with you. The information below lists the categories of sources from which we collect Personal Information in different contexts.

- (a) From you directly, or from other authorized parties acting on your behalf, through our Offline Services and Online Services (e.g., account creation, us providing a product or service to you, visitor registration when you visit our office, phone calls, security cameras at our facilities, and from a device you are using when you visit our website, use our applications, or interact with our communication to you such as email or chat) sources.
- (b) Through referrals. Occasionally, visitors will have the opportunity to forward information to others through our Online Services (or interactive advertisements). The referral Personal Information you provide to facilitate this communication is used on a one-time basis and is not further used by Valvoline to re-contact referred individuals, except in circumstances where we obtain consent from the people you have referred to receive communications from us. We may also retain such Personal Information for other purposes, such as for analysis to better serve our customers.
- (c) From public records made available by federal, state, or local government entities or widely available public sources of data (where not exempt from the definition of Personal Information).
- (d) From Social Media Platforms (e.g., Facebook and X). We may collect Personal Information through our presence on social media and networking platforms. You may use social networks or other online services to access our Online Services. When you do so, information from those services may be made available to us. By associating a social network account with our Online Services, we may access and retain information relating to that account in accordance with the policies of the social network or other online service and this Notice. For example, we may be able to access account or profile information that you have provided to the social network or information about your interactions with the social network. Note, however that the data practices of Social Media Platforms are also governed by their own privacy notices, for which Valvoline is not responsible.
- (e) Third parties that provide data to support our business and operational activities. Such third parties may include our affiliates, business partners, manufacturers, vendors, dealers, credit bureaus, and suppliers who provide goods and services to us. The data practices of these third parties are governed by their own privacy notices, for which Valvoline is not responsible.

## 6. For Which Purposes Do We Collect and Process Your Personal Information?

The purposes for which we collect and use Personal Information depends on, among other things, your relationship and interactions with Valvoline and our products and Services.

We use and disclose Personal Information for the processing purposes described below:

<b>Purpose of Collection and Examples Processing</b>	
Operate and Support our Products and Services	<ul style="list-style-type: none"> <li>• Fulfill a service or provide a product you have requested.</li> <li>• Process a transaction to allow the purchase of our products and services.</li> <li>• Maintain and service your account and relationship with us.</li> <li>• Provide customer service, including responding to any questions, comments, or requests you have for us or for other customer service purposes.</li> <li>• To enable you to participate in a variety of our site's features, including locating your nearest Valvoline services location.</li> </ul>
Improve and Evolve our Services	<ul style="list-style-type: none"> <li>• Conduct internal research, product quality, risk modeling, data analysis, and internal presentation.</li> <li>• Troubleshoot to identify and repair operational errors or otherwise improve our products and/or Services.</li> <li>• Undertaking activities to verify or maintain the quality or safety of our Services, and to improve, upgrade, or enhance our Services.</li> </ul>
Security and Fraud Prevention	<ul style="list-style-type: none"> <li>• To protect the security of Valvoline, our Services and Online Services, or its users and to prevent and address fraud.</li> </ul>
Debugging and Repairs	<ul style="list-style-type: none"> <li>• Identify and repair errors that impair existing intended functionality of our Services.</li> </ul>
Advertise, Market, and Promote Our Products and Services (excluding Cross-Context Behavioral Advertising and Targeted Advertising)	<ul style="list-style-type: none"> <li>• Perform auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with user interaction or transaction specifications and standards (e.g., ecommerce activities)</li> <li>• To assist us in determining relevant advertising and the success of our advertising campaigns; to help us determine where to place our ads, including on other websites; and for promotional activities such as running sweepstakes, contests, and other promotions.</li> <li>• Promote and market our products and Services.</li> </ul>

	<ul style="list-style-type: none"> <li>• Advertise and market additional products and services that are related to the products and services you requested or that are offered by us, our affiliates, or nonaffiliated third parties.</li> <li>• Administer promotions, surveys, discounts, coupons, and rebates.</li> <li>• To customize your experience on our websites, apps, or other Services, or to serve you specific content and offers that are relevant to/customized for you (e.g., pricing and discounts based on your profile, location, or shopping history).</li> <li>• For Third-party and Co-Promotions in order to offer you discounts on products and services that may interest you.</li> </ul>
<p>Support business operations, including to meet risk, legal, and compliance requirements</p>	<ul style="list-style-type: none"> <li>• Facilitate the sale, transfer, merger, reorganization, or other change to a business line or legal entity/ structure.</li> <li>• Detect, investigate, or respond to legal claims; security or privacy incidents; and malicious, deceptive, fraudulent, or illegal activity.</li> <li>• Comply with applicable local, state, federal, and international laws, and other legal and regulatory requests and obligations.</li> <li>• Process your privacy rights requests.</li> <li>• Maintain the safety, security, and integrity of Valvoline owned facilities and property, and those associated with the Valvoline Brand.</li> </ul>
<p>Additional Business Purposes</p>	<ul style="list-style-type: none"> <li>• To comply with legal obligations, as part of our general business operations, for other business administration purposes and in response to legal obligations or process.</li> <li>• To investigate, prevent or take action if someone may be using information for illegal activities, fraud, or in ways that may threaten someone’s safety or violate of our terms or this Notice.</li> <li>• Purposes disclosed at Personal Information collection. For example, we may provide additional disclosures at the time of Personal Information collection, such as on a checkout page.</li> <li>• For purposes that are related to and/or compatible with any of the foregoing purposes.</li> </ul>
<p>Commercial Purposes</p>	<ul style="list-style-type: none"> <li>• Cross-context Behavioral Advertising and Targeted Advertising (as explained below), which may be treated as a Sale and/or Share under State Privacy Laws. For the specific types of Personal Information Sold or Shared for this purpose and the recipients thereof, see the first chart above.</li> <li>• Lead sharing.</li> </ul>

	<ul style="list-style-type: none"><li>• Strategic partnerships.</li><li>• Promotions.</li></ul>
--	---

## 7. Does Valvoline Share or Process Data for the Purpose of Cross-Contextual Behavioral Advertising or Targeted Advertising?

Yes, we use analytics technology such as Google Analytics, including for remarketing purposes. In addition to your state privacy rights described below, you may also opt-out of this use of information about you through third parties such as Google at the following link: <https://adssettings.google.com/u/0/authenticated?hl=en>. To learn more about how Google uses data when you use our Online Services click the following link: <https://policies.google.com/technologies>. You may exercise choices regarding the use of cookies from Adobe Analytics by going to <http://www.adobe.com/privacy/opt-out.html> under the section labeled “Tell our customers not to measure your use of their web sites or tailor their online ads for you.”

You may be able to opt-out of receiving certain advertising tailored to your interests by third parties through the Network Advertising Initiative website, an independent web site not sponsored by or affiliated with Valvoline. To learn more, visit <https://optout.networkadvertising.org/?c=1>. (Note that you will still receive advertising even after opting-out but such advertising may be less targeted to your interests and preferences.)

You may choose whether to receive some Interest-based Advertising by submitting opt-outs. Some of the advertisers and service providers that perform advertising-related services for us and third parties may participate in the Digital Advertising Alliance’s (“DAA”) Self-Regulatory Program for Online Behavioral Advertising. To learn more about how you can exercise certain choices regarding Interest-based Advertising, including use of Cross-device Data for serving ads, visit <http://www.aboutads.info/choices/>, and <http://www.aboutads.info/appchoices> for information on the DAA’s opt-out program specifically for mobile apps (including use of precise location for third party ads). Some of these companies may also be members of the Network Advertising Initiative (“NAI”). To learn more about the NAI and your opt-out options for their members, see <http://www.networkadvertising.org/choices/>. Please be aware that, even if you are able to opt out of certain kinds of Interest-based Advertising, you may continue to receive other types of ads. Opting out only means that those selected members should no longer deliver certain Interest-based Advertising to you but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). Also, if your browsers are configured to reject cookies when you visit these opt-out webpages, or you subsequently erase your cookies, use a different device or web browser or use a non-browser-based method of access (e.g., mobile app), your NAI / DAA browser-based opt-out may not, or may no longer, be effective. Valvoline supports the ad industry’s Self-regulatory Principles for Online Behavioral Advertising (read more here to <https://www.iab.com/wp-content/uploads/2015/05/ven-principles-07-01-09.pdf>) and

expects that ad networks Valvoline directly engages to serve you Interest-based Advertising will do so as well, though Valvoline cannot guaranty their compliance.

We may also use Microsoft Advertising Services. To learn about the data Microsoft collects and how your data is used by it and to opt-out of certain Microsoft browser Interest-based Advertising, please visit <https://www.microsoft.com/en-us/privacy/privacystatement>.

We may also use Google Ad Services. To learn more about the data Google collects and how your data is used by it and to optout of certain Google browser Interest-Based Advertising, please visit <http://www.google.com/settings/ads>.

In addition, we may serve ads on other online services that are targeted to reach people on those services that are also identified on one of more of our data bases (“Matched List Ads”). This is done by using Tracking Technologies or by matching common factors between our data bases and the data bases of the other online services. For instance, we may use such ad services offered by Meta, X, or LinkedIn and other Third-Party Services. We are not responsible for these Third-Party Services, including without limitation their security of the data. You should be able to opt-out of such Matched List Ads through your personal account with the respective Third-Party Services We are not responsible for such third parties’ failure to comply with your or our opt-out instructions, they may not give us notice of opt-outs to our ads that you give to them, and they may change their options without notice to us or you.

Valvoline is not responsible for effectiveness of, or compliance with, any third-party’s opt-out options or programs or the accuracy of their statements regarding their programs.

## **8. Does Valvoline Process Cookies, Pixels, Beacons, and Other Tracking Technology?**

Yes, however, you can limit our tracking as described below in addition to opting out of cookie-based sale, sharing, and targeted advertising as described in Section 14.A(iii).

When you use our Online Services, we may automatically collect information about how you use our Online Services using cookies, pixel tags, web beacons, and other similar or related technologies. We have relationships with third-party advertising and marketing companies to help track and report on usage of our Online Services and to provide insight into individuals who are or may be interested in Valvoline.

Regular cookies may generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options, so you may need to set them separately. Also, tools from commercial browsers may not be effective with regard to Flash cookies (also known as locally shared objects), HTML5 cookies, or other Tracking Technologies. For information on disabling Flash cookies, go to Adobe’s website <http://helpx.adobe.com/flash-player/kb/disable-third-party-local-shared.html>. Please be aware that if you disable or remove these technologies, some parts of the Service may

not work and that when you revisit the Service your ability to limit browser-based Tracking Technologies is subject to your browser settings and limitations.

Some App-related Tracking Technologies in connection with non-browser usage (e.g., most functionality of a mobile app) can only be disabled by uninstalling the app. To uninstall an app, follow the instructions from your operating system or handset manufacturer. Apple and Google mobile device settings have settings to limit ad tracking, and other tracking, but these may not be completely effective.

Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no consensus among industry participants as to what “Do Not Track” means in this context. Like many online services, Valvoline currently does not alter Valvoline’s practices when Valvoline receives a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” you can visit <http://www.allaboutdnt.com>, but Valvoline is not responsible for the completeness or accuracy of this third-party information. Some third parties, however, may offer you choices regarding their Tracking Technologies. One way to potentially identify cookies on our web site is to add the free plug-in to your browser, which according to the plug-in will display for you traditional, browser-based cookies associated with the web sites (but not mobile apps) you visit and privacy and opt-out policies and options of the parties operating those cookies. Valvoline is not responsible for the completeness or accuracy of this tool or third-party choice notices or mechanisms. For specific information on some of the choice options offered by third party analytics and advertising providers, see the next section. We may, from time-to-time, and in certain jurisdictions, offer or point you to tools that allow you to exercise certain preferences regarding cookies and other Tracking Technologies associated with the Services, but such tools rely on third parties and third-party information so we do not guaranty that the tools will provide complete and accurate information or be completely effective. You may also control cookies via your browser settings.

You will need to do this on each browser that you use to access our Services and clearing cookies on your browser(s) may disable your preference settings. Also, our Services may not function properly or as intended if you block all or even certain cookies. Accordingly, you may want to consider the more limited opt-out choices noted in the next section.

## **9. Does Valvoline Process Geolocation?**

In some contexts, Valvoline will track your geolocation. For example, we track geolocation when you use our Online Services to try to find the nearest store that sells the product or service you need. To do so we may use geolocation from WiFi, cellular tower, or GPS. Your device may have settings that allow you to prevent sharing geolocation information with us. You should consult your device’s settings or help documentation for more information about exercising these options. Additional information regarding on the collection, use, and disclosure of Personal Information is in Section 4.

## 10. What Other Choices Do You Have with Respect to Your Personal Information

In addition to following your tracking preferences, Valvoline provides all individuals with the following choices and capabilities.

- (a) **Update Account Information.** If you have registered for an account, you may update information provided in your online account by logging on to your account and editing that information. Our customer service team is also there to help update information about you.
- (b) **Unsubscribe from Email, Text, and Physical Mail Marketing sent by Valvoline.** Our emails contain a link at the bottom of the promotion that will allow you to unsubscribe from marketing emails sent by Valvoline. For text messages, follow the instructions provided in text messages from us or reply to our text with the word, "STOP." You can also remove your information from our email, text, and physical mail marketing list by contacting our Customer Service team at 1-800-FAST-CHANGE (800-327-8242).

## 11. How Do We Handle and Secure Your Personal Information?

We maintain administrative, technical, and physical safeguards designed to protect the Personal Information you provide us. However, no safeguards guarantee 100% security, and, therefore, we cannot guarantee that information provided to Valvoline will never be disclosed in a manner that is inconsistent with this Notice.

## 12. Notice to Minors

Our Services are not intended for users under sixteen (16) years of age and are not directed at, marketed to, nor intended for children or other minors. Valvoline does not knowingly collect any data, including Personal Information, from children or other minors. If you are a minor, do not engage our Services.

If you believe that we have inadvertently collected data from a child under 13 years of age, please contact us at [privacy@valvoline.com](mailto:privacy@valvoline.com), and we will take immediate steps to delete or otherwise treat the data as required by applicable law. Some State Privacy Laws provide additional consideration for children and teens. More information on the privacy of the Personal Information of / from children and, where regulated by State Privacy Laws, teens (collectively "Child-Aged") Consumers is included in the Child-Aged Consumers of Certain States subsection of Section 14 below.

## 13. Retention of Your Data

The length of time that your data is kept is dependent upon your relationship with Valvoline and the reason your data was collected. Our intention is not to keep or store data indefinitely, longer than is reasonably necessary, or longer than permitted by law. See Section 4 above for how long we keep categories of Personal Information.



## **14. State Privacy Notice**

### **A. YOUR CONSUMER RIGHTS AND HOW TO EXERCISE THEM**

As described more below, subject to meeting the requirements for a Verifiable Consumer Request (defined below) and limitations permitted by applicable State Privacy Laws, Valvoline provides certain Consumers the privacy rights described in this section. For residents of states without Consumer privacy rights, we will consider requests but will apply our discretion with respect to if and how we process such requests. We will also consider applying state law rights prior to the effective date of such laws but will do so in our discretion.

To submit a request to exercise your Consumer privacy rights, or to submit a request as an authorized agent, use our [Privacy Request Portal](#) or call us at 1-800-FAST CHANGE (800-327-8242) and respond to any follow-up inquiries we make. Please be aware that we do not accept or process requests through other means (e.g., via fax, chats, social media etc.). The request and verification process is outlined below. The Consumer rights we accommodate are as follows:

#### **(i) Right to Limit Sensitive Personal Information Processing**

With regard to Personal Information that qualifies as Sensitive Personal Information under State Privacy Laws, if you elect to provide us with that Sensitive Personal Information you will have consented to such processing.

We only process Sensitive Personal Information for purposes that are exempt from Consumer choice under State Privacy Laws.

#### **(ii) Right to Know / Access**

Residents of states with State Privacy Laws are entitled to access Personal Information subject to state specific limitations on the number of requests that are permitted.

#### **(1) Categories / Confirm Processing**

California residents have a right to submit a request for any of the following for the period that is 12-months prior to the request date:

- The categories of Personal Information we have collected about you.
- The categories of sources from which we collected your Personal Information.
- The Business Purposes or Commercial Purposes for our collecting, Selling, or Sharing your Personal Information.
- The categories of Third Parties to whom we have disclosed your Personal Information.
- A list of the categories of Personal Information disclosed for a Business Purpose and, for each, the categories of recipients, or that no disclosure occurred.



- A list of the categories of Personal Information Sold or Shared about you and, for each, the categories of recipients, or that no Sale or Share occurred.

Residents of other applicable states are entitled to confirm our processing of their Personal Information, and they can do so by making a Categories request but are not entitled to categories summaries.

## **(2) Specific Pieces**

You may request Personal Information to obtain a transportable copy, subject to applicable request limits, of your Personal Information that we have collected and are maintaining. For your specific pieces of Personal Information, as required by applicable State Privacy Laws, we will apply heightened verification standards. We have no obligation to re-identify information or to keep Personal Information longer than we need it or are required to by applicable law to comply with access requests.

## **(3) List of Third-Party Data Recipients**

For Delaware residents, you may request a list of the categories of third parties with whom we have disclosed your personal information. For Oregon residents, you may request a list of the specific third parties with whom we have disclosed your Personal Information, if we are able, or Personal Information, generally.

### **(iii) Do Not Sell / Share / Target**

Under the various State Privacy Laws there are broad and differing concepts of “Selling” Personal Information for which an opt-out is required. California also has an opt-out from “Sharing” for Cross-Context Behavioral Advertising (use of Personal Information from different businesses or services to target advertisements). Other states have an opt-out of “Targeted Advertising” (defined differently but also addressing tracking, profiling, and targeting of advertisements). We may Sell or Share your Personal Information and/or use your Personal Information for Targeted Advertising, as these terms apply under State Privacy Laws. However, we provide Consumers an opt out of Sale/Sharing/Targeting that is intended to combine all of these state opt-outs into a single opt-out available to residents of states with State Privacy Laws.

We understand that giving access to Personal Information on our Services, or otherwise, to Third-Party Digital Businesses could be deemed a Sale and/or Share under some state laws and thus we will treat such Personal Information (e.g., cookie ID, IP address, and other online IDs and internet or other electronic activity information) collected by Third-Party Digital Businesses, where not limited to acting as our Service Provider (or Contractor or Processor), as a Sale and/or Share and subject to a Do Not Sell/Share/Target opt-out request. We will not Sell your Personal Information, Share your Personal Information for Cross-Context Behavioral Advertising, or process your Personal

Information for Targeted Advertising if you make a Do Not Sell/Share/Target opt-out request.

Opt-out for non-cookie Personal Information: If you want to limit our processing of your non-cookie Personal Information (e.g., your email address) for Targeted Advertising, or opt-out of the Sale/Sharing of such data, make an opt-out request [here](#) which should have Do Not Sell/Share/Target Non-Cookie Personal Information option].

Opt-out for cookie-based Personal Information: If you want to limit our processing of your cookie-related Personal Information for Targeted Advertising, opt-out of the Sale/Sharing of such Personal Information, or if you are a resident of a state without State Privacy Laws and wish to configure your cookie settings, you need to exercise a separate opt-out request on our cookie management tool. This is because we have to use different technologies to apply your opt-out to cookie Personal Information and to non-cookie Personal Information. Our cookie management tool enables you to exercise such an opt-out request as to cookie-based Personal Information and enable certain cookie preferences on your device. A similar tool is available for our app, which you can access via the Do Not Sell/Share/Target option in the settings menu. You must exercise your preferences on each of our websites and apps you visit, from each browser you use, and on each device that you use. Since your browser opt-out is designated by a cookie, if you clear or block cookies, your preferences will no longer be effective and you will need to enable them again via our cookie management tool. Beware that if you use ad blocking software, our cookie banner may not appear when you visit our Services and you may have to use the link above to access the tool.

Opt-out preference signals (also known as global privacy control or GPC): Some of the State Privacy Laws require businesses to process GPC signals, which is referred to in California as opt-out preference signals (“OOPS”), which are signals sent by a platform, technology, or mechanism, enabled by individuals on their devices or browsers, that communicate the individual’s choice to opt-out of the Sale and Sharing of personal information. To use an OOPS/GPC, you can download an internet browser or a plugin to use on your current internet browser and follow the settings to enable the OOPS/GPC. We have configured the settings of our consent management platform to receive and process GPC signals on our website, which is explained here: <https://www.onetrust.com/blog/what-is-gpc-and-how-can-the-onetrust-consent-management-platform-cmp-support/>. We process OOPS/GPC with respect to Sales and Sharing that may occur in the context of collection of cookie-based Personal Information by tracking technologies online by Third-Party Digital Businesses, discussed above, and apply it to the specific browser on which you enable OOPS/GPC.

We currently do not, due to technical limitations, process OOPS/GPC for opt-outs of Sales and Sharing in other contexts (e.g., non-cookie Personal Information). We do not: (1) charge a fee for use of our Service if you have enabled OOPS/GPC; (2) change your experience with any product or Service if you use OOPS/GPC; or (3) display a notification, pop-up, text, graphic, animation, sound, video, or any interstitial in response to the OOPS/GPC, except we may display a message acknowledging the signal.

We may disclose your Personal Information for the following purposes, which are not a Sale or Share: (i) if you direct us to disclose Personal Information; (ii) to comply with a Consumer rights request you submit to us; (iii) disclosures amongst the entities that constitute Valvoline as defined above, or as part of a Corporate Transaction; and (iv) as otherwise required or permitted by applicable law.

**(iv) Child-Aged Consumers of Certain States**

We do not knowingly Sell or Share, or use for Targeted Advertising, the Personal Information of / from Child-Aged or other similar term (as defined by the applicable State Privacy Law) Consumers who are residents of certain states, unless we receive affirmative opt-in authorization from: (i) the applicable Consumer if the Consumer is at least 13 years of age and Consumer consent is required under the applicable State Privacy Law; or (ii) the parent or guardian of the Consumer if the Consumer is less than 13 years of age. If you think we may have unknowingly Sold or Shared Personal Information, or used Personal Information for Targeted Advertising, of / from a Consumer under the threshold age (as set by the applicable State Privacy Law) without the appropriate affirmative opt-in authorization, please report that to us as described in Section 15.

**(v) Right to Delete**

Except to the extent we have a basis for retention under applicable law, you may request that we delete your Personal Information. Our retention rights include, without limitation:

- to complete transactions and Services you have requested;
- for security purposes;
- for legitimate internal Business Purposes (e.g., maintaining business records);
- to comply with law and to cooperate with law enforcement; and
- to exercise or defend legal claims.

If you are a Canadian resident and want to withdraw consent to processing, please submit a deletion. Also note that, depending on where you reside, we may not be required to delete your Personal Information that we did not collect directly from you.

**(vi) Correct Your Personal Information**

Consumers may bring inaccuracies they find in their Personal Information that we maintain to our attention, and we will act upon such a complaint as required by applicable law. You can also make changes to your online account in the account settings section of the account. That may not, however, change your information that exists in other places.

**(vii) Automated Decision Making/Profiling**

We do not currently engage in Automated Decision Making or Profiling.

## **(viii) How to Exercise Your Consumer Privacy Rights**

To submit a request to exercise your Consumer privacy rights, or to submit a request as an authorized agent, use our [Privacy Request Portal](#) or call us at 1-800-327-8242 and respond to any follow-up inquiries we make. Please be aware that we do not accept or process requests through other means (e.g., via fax, chats, social media etc.).

### **(1) Your Request Must be a Verifiable Consumer Request**

As permitted or required by applicable State Privacy Laws, any request you submit to us must be a Verifiable Consumer Request, meaning when you make any type of request, we may ask you to provide verifying information, such as your name, e-mail, phone number and/or account information. We will review the information provided and may request additional information (e.g., information regarding products or services purchased) via e-mail or other means to ensure we are interacting with the correct individual. We will not fulfill your Right to Know / Access, Right to Delete, or Right to Correction request unless you have provided sufficient information for us to reasonably verify you are the Consumer about whom we collected Personal Information. We do not verify opt-outs of Sell/Share/Target or Limitation of Sensitive Personal Information requests unless we suspect fraud.

You are not required to create a password-protected account with us to make a Verifiable Consumer Request, but you may use your password-protected account to do so. If we suspect fraudulent or malicious activity on or from the password-protected account, we may decline a request or request that you provide further verifying information.

We verify your request to a reasonable degree of certainty or to a reasonably high degree of certainty depending on the sensitivity of the request and if we suspect fraud. This involves comparing the information in your request to your information that we may have on file. To protect Consumers, if we are unable to verify you sufficiently, we will be unable to honor your request. We will use Personal Information provided in a Verifiable Consumer Request only to verify your identity or authority to make the request, to process the request, or as permitted by law, unless you also gave it to us for another purpose.

### **(2) Agent Requests**

You may use an authorized agent to make a request for you, subject to our verification of the agent, the agent's authority to submit requests on your behalf, and of you. You can submit such requests on our [Privacy Request Portal](#). Once your agent's authority is confirmed, they may exercise rights on your behalf subject to the agency requirements of applicable laws.

### **(3) Appeals**

You may appeal Valvoline's decision regarding a request by following the instructions in our response to your request.

#### **(ix) Our Responses**

Some Personal Information that we maintain is insufficiently specific for us to be able to associate it with a verified Consumer (e.g., clickstream data tied only to a pseudonymous browser ID). We do not include that Personal Information in response to those requests. If we deny a request, in whole or in part, we will explain the reasons in our response.

We will make commercially reasonable efforts to identify Consumer Personal Information that we process to respond to your Consumer request(s). In some cases, particularly with voluminous and/or typically irrelevant data, we may suggest you receive the most recent or a summary of your Personal Information and give you the opportunity to elect whether you want the rest. We reserve the right to direct you to where you may access and copy responsive Personal Information yourself. We will typically not charge a fee to fully respond to your requests; provided, however, that we may charge a reasonable fee or refuse to act upon a request if your request is excessive, repetitive, unfounded, or overly burdensome. If we determine that the request warrants a fee or that we may refuse it, we will give you notice explaining why we made that decision. You will be provided a cost estimate and the opportunity to accept such fees before we will charge you for responding to your request.

Consistent with applicable State Privacy Laws and our interest in the security of your Personal Information, we will not deliver to you Sensitive Personal Information in response to a Consumer privacy rights request; however, you may be able to access some of this information yourself through your account if you have an active account with us.

#### **B. Non-Discrimination/non-retaliation**

We will not discriminate or retaliate against you in a manner prohibited by applicable State Privacy Laws for your exercise of your Consumer privacy rights. We may charge a different price or rate, or offer a different level or quality of goods or service, to the extent that doing so is reasonably related to the value of the applicable Personal Information.

#### **C. Notice of Financial Incentive Programs**

We may offer discounts or other rewards ("Incentive(s)") from time-to-time to Consumers who provide us with Personal Information, such as name, phone number, email address, IP address, or location. You may opt-in to Incentives by entering a competition, promotion, or survey or other loyalty Incentive programs we may offer from time-to-time ("Program(s)"). Each Program may have additional terms, available on the Program page or at Program sign-up. The Incentives will be described in the Program page or at Program sign-up.

We measure the value of your Personal Information collected from Programs by the cost of operating the applicable Program (excluding Incentive costs) and/or the cost of providing the Incentive. We deem the value of the Personal Information to be reasonably related to the value of the Incentive, and by subscribing to these Programs, you indicate you agree. If you do not agree, please do not subscribe to the Programs. If you subsequently wish to withdraw from the Programs, the method for doing so will be explained in the applicable Program terms. We do not limit participation in our financial incentive programs to Consumers who do not exercise their Consumer privacy rights. However, a deletion request will not delete Program Personal Information because the information is necessary to maintain your participation in the Program. If you desire to delete Program Personal Information, terminate your participation in the Program before making a deletion request pursuant to State Privacy Laws.

#### **D. Our Rights and the Rights of Others**

Notwithstanding anything to the contrary, we may collect, use, and disclose your Personal Information as required or permitted by applicable law, and this may override your rights under State Privacy Laws. In addition, we are not required to honor your requests to the extent that doing so would infringe upon our or another person's or party's rights or conflict with applicable law.

#### **E. Additional Notices for California Residents**

In addition to the CCPA, certain Californians are entitled to certain other notices, as follows:

##### **(i) California Minors**

Although our Online Services are intended for an audience over the age of majority, any California residents under the age of eighteen (18) who have registered to use our Online Services, and posted content on the Online Services, can request removal by contacting us through the methods outlined in Section 15, detailing where the content is posted and attesting you posted it. We will then make reasonably good faith efforts to remove the post from prospective public view or anonymize it, so the minor cannot be individually identified to the extent required by applicable law. This removal process cannot ensure complete or comprehensive removal. For instance, third parties may have republished or archived content by search engines we do not control.

##### **(ii) Shine the Light**

We may disclose "personal information," as defined by California's "Shine the Light" law, to third parties for such third parties own direct marketing purposes. California residents may opt-out of this sharing by contacting us at [privacy@valvoline.com](mailto:privacy@valvoline.com) or

ATTN: Privacy  
Valvoline Inc.  
100 Valvoline Way, Suite 100

Lexington, KY 40509

You must put the statement “Shine the Light Request” in the body of your correspondence. In your request, please attest to the fact that you are a California resident and provide a current California address for your response. This right is different than, and in addition to, CCPA rights, and must be requested separately. However, a Do Not Sell/Share/Target opt-out is broader and will limit our disclosing to third parties for their own direct marketing purposes without the need for making a separate Shine the Light request. We will not accept Shine the Light requests by telephone or by fax and are not responsible for requests not labeled or sent properly, or that are incomplete.

#### **15. Who Do I Contact if I Have Comments or Questions?**

General questions about this Privacy Notice or the processing of your Personal Information can be directed to the Valvoline Privacy Team and our Data Protection Officer at [Privacy@Valvoline.com](mailto:Privacy@Valvoline.com) or you may contact Customer Care at 1-800- FAST CHANGE (800-327-8242).

To exercise your privacy rights or to file a privacy related complaint or appeal follow the instructions in this Notice.