

California Consumer Privacy Act

Notice to California Residents

Last Update: June 15, 2020

This Notice to California Residents ("CCPA Notice"), provided by Tru Kids Inc. and its subsidiaries, divisions, affiliates, brands, and other related companies (collectively, "Tru Kids," "we," "us," or "our") pursuant to the California Consumer Privacy Act ("CCPA"), applies to natural persons who reside in the State of California ("consumers" or "you"), that visit our website (<https://www.toysrus.com/>) (the "Website") or otherwise engage or interact with us and supplements our [Privacy Policy](#). Any terms used herein but not defined shall have the meaning assigned in our Privacy Policy, or, if not defined therein, the CCPA.

In the event of any conflict or inconsistency between this CCPA Notice and our Privacy Policy, this CCPA Notice shall control only with respect to the Personal Information (as defined in CCPA) of consumers, and their households or devices. If you are located outside of the State of California this CCPA Notice does not apply to you and you should refer to our Privacy Policy.

Information We Collect

Categories of Personal Information. Tru Kids has or may have collected and/or received the Categories of Personal Information identified below (with examples) from or about consumers, their households or devices, within the twelve (12) months preceding the Last Update of this CCPA Notice ("Last Update"). Personal Information does not include (i) publicly available information from government records; (ii) deidentified or aggregated Personal Information; or (iii) information excluded from the CCPA including information regulated by certain sector-specific data protection laws including the Health Insurance Portability and Accountability Act of 1996, the California Confidentiality of Medical Information Act, the Gramm-Leach-Bliley Act of 1999, and the California Financial Information Privacy Act.

- **Identifiers.** A name, postal address, unique personal identifier, online identifier, IP address, email address, social security number, driver's license number or other similar identifiers.
- **Categories of Personal Information Listed in Cal. Civ. Code § 1798.80(e).** A name, address, social security number, telephone number, bank account or other financial information, education, employment history, and health insurance information. Some Personal Information included in this category may overlap with other categories.
- **Protected classification characteristics under California or federal law.** Age, race, gender, veteran or military status.
- **Commercial Information.** Records products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Internet or other similar network activity.** Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
- **Professional or employment-related information.** Current or past job history or performance evaluations.

- **Non-public education information.** Education records directly related to a student maintained by an educational institution or party acting on its behalf.
- **Inferences.** Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes

Categories of Sources. We collect the Categories of Personal Information listed above from the following Categories of Sources: (i) directly from consumers (e.g., forms, surveys, responses, or other direct interactions from or with consumers), (ii) indirectly from consumers (e.g., consumer activity online, interactions with our Website and other sites), (iii) data resellers/brokers, and (iv) data analytics providers.

Use of Personal Information. We may use or disclose the Personal Information we collect for one or more of the following commercial or business purposes (each, a “Business Purpose”) disclosed in the “Using Your Personal Information” section of our Privacy Policy.

Categories of Third Party Recipients. We may share your Personal Information with the following Categories of Third Party Recipients for Business Purposes:

- **Service Providers,** which include IT and cloud hosting companies, payment providers, transactions reporting providers, customer relationship management, email marketing providers, analytics providers, and providers of administrative services
- Subsidiaries, divisions, affiliates, brands, parents and other related companies of TRU Kids Inc. (“Affiliates”)

Disclosures of Personal Information for a Business Purpose. In the twelve (12) months preceding the Last Update, we may have disclosed the Categories of Personal Information for a Business Purpose to the Categories of Third Parties set forth in Table I.

Table I

Categories of Personal Information Collected	Categories of Third Party Recipients
Identifiers	Service Providers, Affiliates
Categories of Personal Information Listed in Cal. Civ. Code § 1798.80(e)	Service Providers, Affiliates
Protected classification characteristics under California or federal law.	Service Providers, Affiliates
Commercial Information	Service Providers, Affiliates
Internet or other similar network activity	Service Providers, Affiliates
Professional or employment-related information	Service Providers, Affiliates
Non-public education information	Service Providers, Affiliates
Inferences	Service Providers, Affiliates

Sales of Personal Information. In the twelve (12) months preceding the Last Update, we have not sold Personal Information.

Your Rights and Choices

The CCPA provides consumers with specific rights regarding their Personal Information. This section describes such rights and explains how to exercise them.

Right to Know About Personal Information. You have the right to request that we disclose certain information to you about our collection, disclosure, sale and use of your Personal Information. Once we receive and verify your request, we will disclose to you the following (to the extent applicable to your request):

- Specific pieces of Personal Information we collected about you in the preceding twelve (12) months (also known as a data portability request)
- Categories of Personal Information we collected about you in the preceding twelve (12) months
- Categories of Sources from which the Personal Information was collected
- Our Business Purpose for collecting or selling that Personal Information
- If we disclosed your Personal Information for a Business Purpose, Categories of Personal Information that we disclosed for a Business Purpose and the Categories of Third Party Recipients to whom the Personal Information was disclosed.

Right to Request Deletion. You have the right to request that we delete any of Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and verify your request, we will delete your Personal Information from our records, unless an exception applies.

Exercising Rights to Know or Request Deletion. To exercise the rights to know or request deletion described above, please submit a verifiable consumer request to us by either: (a) calling us at (888) 778-0100, or (b) submitting your request by email to customerservice@toysrus.com. You may only make a verifiable consumer request under the right to know twice within a 12-month period. The verifiable consumer request must: (i) provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; and (ii) describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information related to you.

Verification Process. To submit a verifiable consumer request, the consumer may be required to provide up to three data points, which may include additional Personal Information, to enable us to verify the consumer's identity with the applicable degree of certainty required by the CCPA. We will use Personal Information provided in a verifiable consumer request solely for the purpose of verifying the requestor's identity or authority to make the request. We or a third party on our behalf may follow up with you to determine whether a request is a verifiable consumer request under applicable law. If we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you, we will deny the consumer request in whole or in part and will not to disclose the information requested or, as applicable, will not delete the information requested. We will respond to any such consumer request with a denial, and will also explain why it has no reasonable method by which it can verify the identity of the requestor.

Response Timing and Format. We will confirm receipt of a verifiable consumer request within then (10) business days of its receipt. We will endeavor to respond to a verifiable consumer request within forty-five (45) calendar days of its receipt. If we require more time, we will notify you of the extension and provide an explanation of the reason for the extension in writing, and we will provide you with a response no later than ninety (90) calendar days of receipt of the request. We will deliver our written response by mail or electronically. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance. We may charge a reasonable fee to process or respond to your verifiable consumer requests if they are excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for this decision and provide you with a cost estimate before completing your request.

Right to Opt-Out of the Sale of Personal Information. We do not sell the Personal Information of consumers (including minors under 16 years of age). However, if you are 16 years of age or older, you have the right, at any time, to direct us to not sell your Personal Information (the "right to opt-out") and if you are under 16 years of age you have the right to opt-in to the sale of your Personal Information.

Right to Non-Discrimination. We will not discriminate against you for exercising any of your CCPA rights. We will not (i) deny you products or services, (ii) charge you different prices or rates for products or services, including through granting discounts or other benefits, or imposing penalties, (iii) provide you a different level or quality of products or services, and (iv) suggest that you may receive a different price or rate for products or services or a different level or quality of products or services.

Right to Designate an Authorized Agent

If you submit a request to know or delete your Personal Information through the use of an authorized agent, we may require that you (i) provide the authorized agent written permission to act on your behalf, and (ii) verify their identity directly with us. We may deny a request from an authorized agent that does not submit proof of authorization.

Other California Privacy Rights

Pursuant to California's "Shine the Light" law (Civil Code Section § 1798.83), California residents have the right to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes, including the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties.

To make such a request, please send an email to customerservice@toysrus.com.

Changes to Our CCPA Notice

This CCPA Notice is effective as of the date of the Last Update stated at the top of this CCPA Notice. We may change this CCPA Notice from time to time with or without notice to you. By visiting or accessing the Website or otherwise engaging or interacting with us after we make any such changes to this CCPA Notice, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, and without prejudice to the foregoing, our use of your Personal Information is governed by the CCPA Notice in current effect. Please refer back to this CCPA Notice on a regular basis.

Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your information described below and in the CCPA Notice, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (888) 778-0100

E-mail: customerservice@toysrus.com

Postal address: TRU Kids Inc.
5 Wood Hollow Road
Parsippany, NJ 07054