

Comparison of California Financial Incentive and Colorado Loyalty Program Disclosure Requirements

| Requirement | California Financial Incentive | Colorado Bona Fide Loyalty Program |
|---|--------------------------------|------------------------------------|
| A summary of the offering | ✓ | |
| A description of the material terms, including categories of personal information involved and the value of personal information | ✓ | |
| How a consumer can opt in | ✓ | |
| Notice of the right to withdraw from the offering, and instructions on how to do so | ✓ | |
| An explanation of how the price or service difference provided by the program is reasonably related to the value of the consumer’s data, including: -An estimate of the value of the consumer’s personal information -A description of the methods used to calculate the value of the consumer’s personal information | ✓ | |
| The categories of personal data collected through the program that will be sold or processed for targeted advertising, if any | | ✓ |
| The categories of third parties that will receive personal data through the program, including whether personal data will be provided to data brokers | | ✓ |
| A list of any Bona Fide Loyalty Program Partners, and the benefits provided by each partner | | ✓ |
| An explanation of why deletion of personal data would make it impossible to provide program benefits (if applicable) | | ✓ |
| An explanation of why sensitive data is needed to provide program benefits (if applicable) | | ✓ |
| A link to the business’s privacy policy | | ✓ |