

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		✓