

CCPA/CPRA Privacy Policy for California Residents (Managers)

Last updated [May.03.2026]

This Privacy Policy for California Residents ("Notice") supplements the information contained in the Privacy Policy of Kampfire, operated by Obrecsys LLC. (collectively, "Kampfire" "Company," "we," "us," or "our") and applies solely to visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this Notice to comply with the California Consumer Privacy Act of 2018 and the California Privacy Rights Act of 2020 ("CCPA/CPRA") and other California privacy laws. Any terms defined in the CCPA/CPRA have the same meaning when used in this Notice.

All capitalized terms not specifically defined in this Notice shall have the meaning prescribed to them in the Terms and Conditions at https://docs.kampfire.events/TC_Ma.pdf and in the Privacy Notice at https://docs.kampfire.events/Pr_No_Ma.pdf.

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("Personal Information").

Personal information does not include:

0. Publicly available information from government records.
1. Deidentified or aggregated consumer information.
2. Information excluded from the CCPA/CPRA's scope, like:
3. Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH), the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
4. Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, We may have collected the following categories of Personal Information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, physical characteristics or description, address, bank account number, credit card number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories.	YES

Category	Examples	Collected
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information	Physiological, behavioral, and characteristics, or activity patterns used to extract a template or other identifier.	YES
F. Internet or other similar network activity.	Browsing history, browsing speed, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Electronic, visual, or similar information	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you, information you voluntarily provide to us. For example, When you RSVP to an event through Our Platform, create an account or from your registration to the Platforms.
- Directly and indirectly from activity on the Platforms. For example, Information derived from photos and metadata: As part of Our normal business operations, we collect photos through Our Services. Such photos are uploaded by the Managers, Team Members, you or someone on their behalf to Our Platforms. We extract information from those photos including digital representation of distinct characteristics of an individual's face measurements used for facial recognition, *inter alia*, identification of the Audience in the event's photos and videos and, behavior analysis based on the Audience's photos.

- Directly from you via sales. For example, processing and fulfilling orders or requests for customer support.

Use of Personal Information

We may use, sale or disclose the personal information we collect for one or more of the following business purposes:

- To provide you with the Platforms, its contents and our Services, and any other information, products or services that you request from us.
- To Pair your Personal Information with the biometric data and other metadata information derived from photos, as part of Our core Services.
- To Identify you in photos taken on events and uploaded to Our Services, using facial recognition software, which is provided by AWS, in order to create grouped personalized albums.

For how facial recognition works, please see our Privacy notice at https://docs.kampfire.events/Pr_No_Ma.pdf.

- To fulfill or meet the reason for which the information is provided. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry.
- To provide you with information that you request from us.
- To provide you with support and to respond to your inquiries.
- To provide you with email alerts, event registrations and other notices concerning our products, events, or news, that may be of interest to you, including notices about your account, expiration and renewal notices.
- To improve our Platforms and present its contents to you.
- Notify you when updates are available, and of changes to any products or services we offer or provide though it.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA/CPRA.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to

keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract.

We may also share your personal information by selling it to third parties, subject to your right to opt-out of those sales. Our personal information sales do not include information about individuals we know are under age 16.

In the preceding twelve (12) months, We have disclosed the following categories of personal information for a business purpose:

Category A	Identifiers
Category B	California Customer Records personal information
Category D	Commercial information
Category E	Biometric information
Category F	Internet or other similar network activity
Category G	Geolocation data
Category H	Sensory data

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Business Partners, Vendors, Consultants and Other Third-Party Service providers, such as for sales, marketing, customer service, data storage, and employment applications
- Third parties to whom you authorize us to disclose your personal information in connection with the Services we provide to you.

In the preceding twelve (12) months, Company has sold the following categories of personal information to the categories of third parties indicated above.

Your Rights and Choices

The CCPA/CPRA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA/CPRA rights and explains how to exercise those rights.

Right to Know and Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting or selling that Personal Information.
- The categories of third parties with whom we share that Personal Information.

- The specific pieces of Personal Information we collected about you (also called a data portability request).
- If applicable, whether we sold or disclosed your Personal Information for an identified business purpose, along with two separate lists disclosing:
 1. the categories of Personal Information about you that we have sold within the meaning of the CCPA/CPRA and the categories of third parties to whom the Personal Information was sold; and
 2. the categories of Personal Information about you that we disclosed for a business purpose.

Right to Limit

You have the right to request that we limit the use and disclosure of any of your sensitive Personal Information, pursuant to Civil Code section 1798.121 subdivision(a), which we have collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies, due to regulatory or operational requirements (e.g., in accordance with the provision of services to you).

Right to Correct

You have the right to request that we correct any inaccurate Personal Information that we maintain about you as set forth in Civil Code section 1798.106.

Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) the relevant Personal Information from our active systems immediately, and residual copies in encrypted backups will be permanently destroyed within thirty-five (35) days. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.

- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Rights to Opt Out of the Sale/Sharing of Personal Information

You have the right to request that we do not sell any of your Personal Information. As noted above, we do not sell Personal Information of California residents.

You have the right to request that we limit or do not share any of your Personal Information. Please note, we only use or share Personal Information of California residents for the purposes identified in CPRA § 7027(m) ("Permissible Purposes") and only as necessary and proportionate for such Permissible Purposes.

Right to No Retaliation following the Exercise of Your Rights

We cannot deny goods or services, charge you different prices or rates, including through granting discounts or other benefits, or imposing penalties, or provide a different level or quality of goods or services because you exercised your rights under the CCPA/CPRA; however, if you refuse to provide your personal information to us or ask us to delete your personal information, and that personal information is necessary for us to provide you with goods or services, we may not be able to complete the applicable transaction(s).

Pursuant to the CCPA/CPRA, from time to time, we may offer you promotions, discounts and other deals in exchange for collecting or keeping your personal information. You may ask us to delete or stop selling your personal information, but you may not be able to continue participating in the special deals we offer in exchange for personal information. If you are unsure of how your request may affect your participation in a special offer, please ask your Relationship Manager.

Exercising Your Access, Data Portability, Limitation and Deletion Rights

To exercise your access, data portability, and deletion rights described above, please submit a request by either:

- Logging into your account settings and updating your account.
- Adjusting your device or Platforms permissions.
- Contacting us using the contact information:

Emailing us at: contact@kampfiredvents

Calling us at: +1.917.5652300

The verifiable consumer request must:

- Provide sufficient information to allow us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail to allow us to properly understand, evaluate, and respond to it.

Only you or a person who you authorize to act on your behalf may make a verifiable consumer request related to your Personal Information. Under California law, you may designate an authorized agent to make a request

on your behalf. Your agent may be subject to the same verification procedures that we use to verify consumers who do not currently have a relationship with us. Additionally, we may require you to verify your own identity in response to a request, even if you have chosen to use an agent, and ask that you directly confirm to us that you have provided the authorized agent permission to make a request on your behalf. The foregoing shall not apply if you have provided your authorized agent with a power of attorney pursuant to Probate Code sections 4121 to 4130 and either you or your agent are able to provide us with a copy of such document.

You may also make a verifiable consumer request on behalf of a minor child for whom you are an authorized parent or guardian; however, note that in connection with your assertion of such rights on behalf of a minor child, we may require that you submit a signed declaration under penalty of perjury confirming that you are an authorized parent or guardian of such minor child.

Verifying Your Request

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 relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify your identity or authority to make the request. We may otherwise limit our response to your request as permitted under applicable law.

Whenever feasible, we will match the identifying information provided by you to the Personal Information we maintain or use a third-party identity verification service that complies with the CCPA/CPRA. However, if we cannot verify your identity from the Personal Information that we maintain, we may request additional information from you, including, inter alia, that you submit a signed declaration under penalty of perjury that you are the consumer whose personal information is the subject of your request. Any additional information so submitted shall only be used for the purposes of verifying your identity.

If we have a good faith, reasonable, and documented belief that a consumer request made by you or on your behalf by an agent is fraudulent or abusive, we may deny the request. In such an event, we will inform you of the denial and provide an explanation.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 calendar days of its receipt. If we require more time (up to 90 calendar days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. 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 usable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

If we deny your request in whole or in part, we shall explain the basis for denial, including any conflict with federal or state law, exception to the CCPA/CPRA, inadequacy in the required documentation, or contention that compliance proves impossible or involves a disproportionate effort with sufficient details to provide you with a meaningful understanding.

Personal Information Sales Opt-In Rights

We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-in, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link: <https://www.kampfire.online/contact>

Other California Privacy Rights

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

Changes to Our Privacy Notice

We reserve the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will notify you through a notice on our website homepage. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

Contact Information

If you have any questions or comments about this Notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us via the options above or at:

Obreccsys LLC.

Attn: Legal Department

Bldg C, Ste C

3349 Hwy138

Wall, NJ 07119

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