

Effective Date: July 1, 2023

Last Updated: July 1, 2023

## 1.) Introduction

This Privacy Notice (“Notice”) describes how Valvoline and its subsidiaries and affiliates (collectively, “Valvoline”, “we”, “us”, or “our”) collects, uses, stores, shares, sells, deletes, or otherwise processes your personal information. At Valvoline we believe that it all starts with people, which is why we take the job of protecting personal information seriously. Valvoline brings “Hands-On-Expertise” and the industries best service model as a provider of instant oil changes. 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.

The privacy and protection of Personal Information is important to Valvoline. This Privacy Notice can change over time. The changes we make to the Privacy Notice will become effective upon posting.

**PLEASE READ THIS NOTICE CAREFULLY. BY ACCESSING AND/OR USING OUR ONLINE SERVICES, SERVICES, OR BY COMMUNICATING WITH US IN ANY MANNER, YOU REPRESENT THAT YOU HAVE READ AND UNDERSTOOD THIS NOTICE.**

By accessing or using our products and services, you agree to 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.

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

This Notice applies to Personal Information we process (i.e., collect, use, store, share, delete, etc.) from or about you:

- a. when you access and use our websites, mobile applications, and other Online Services (“Online Services”);
- b. when you use or interact with us or our products and services offline (“Services”);
- c. when you communicate with us in any manner, including by social media, reviewing our products and services, email, chat, telephone, and/or in person (“Communications”);
- d. from third parties, when disclosed by the third party and processed by us;  
and

- e. when you seek employment or are employed by Valvoline (“employment”).

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

This Notice applies to the processing (including collecting, storing, accessing, using, transferring, sharing, disclosing, and deleting) 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;
- Business partners and their representatives;
- Franchisees and their representatives and employees;
- Suppliers who provide any services or products to Valvoline and their representatives;
- Employees and Contractors of Valvoline;
- Job applicants seeking to hold employment at Valvoline;
- Subscribers to Valvoline’s publications, newsletters, and social media;
- Visitors to Valvoline offices and facilities; 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. Interacting with or enabling these features may lead to other third parties having access to or processing your Personal Information. Valvoline does not have any control over, nor do we endorse, these third-party features and we are not responsible for the privacy or security of any information you provide to any third-party which may be associated with or accessible through a Valvoline owned product, platform, or service. We encourage you to review the privacy policies of these third parties before using these features.

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

Valvoline collects and processes information that identifies, relates to, or could reasonably be linked with you (“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 Online Services, to contact you, and in the employment and human resources context. The Personal Information we collect and process depends on your relationship or interaction with Valvoline. Within the last 12 months we may have collected the following.

a) We may generally collect and process the following categories of Personal Information:

1. Personal Identifiers and Contact Information—such as full name, address, telephone number, license plate numbers, email address, business name, membership information (when you have us use such information), or account name.
2. Characteristics of Protected Classes- such as gender, age, race, ethnicity, national origin, citizenship, marital status, or military status.
3. Purchase, Transaction History, and Incentives Information—such as information about your purchasing habits and tendencies, services or product recommendations, information about when and how you purchased a service or product from us, and information about how you responded to an incentive offer, coupon, or discount, membership information, and payment method information.
4. Internet or Online Information— such as IP address, data about the applications and devices you use to visit our Online Services, browsing and search history, interaction with our websites, applications, or advertisements, user login and access information, general settings from your phone, browser, or search engine which you make available to us, or language preference in the context of using our services, device type, operating system, and browser information, and other device identifiers, whether you navigated from or navigated to another website and the address of the website, and information regarding your internet service provider.
5. Geolocation Data—such as device or equipment location.
6. Audio, Visual, and Electronic Information—such as call, online chat transcripts, email, electronic communication records, video recordings, reviews, surveys, physical security and operational camera footage, and thermal temperature screenings (when needed or required).
7. Inferences—inferences based on information about an individual to create a summary about an individual's preferences and characteristics.

8. Account Information – Such as information used to create an account with us, and information used to understand your interaction with your account.
  9. Indirect Identifiers – Such as your signature, VIN number, and Vehicle information (for example, year, make, and model).
- b) If you are an installer, vendor, supplier, franchisee, or other business partner of Valvoline, in addition to the Personal Information listed above, we may also collect and process the following Personal Information:
1. Information to evaluate Credit and Trustworthiness- Federal or state issued identification numbers, including Social Security number, driver's license number, and passport number, Birth Date, Credit Reports, and other information used to determine whether Valvoline will do business with you, and records of personal and business property.
  2. Background Information—such as data we require to ensure Valvoline will do business or enter into a relationship with you, to ensure your and our security, and to prevent and investigate fraud.
  3. Professional or Employment Information—such as business entity information, professional affiliations, or work history.
- c) If you are an employee or job applicant, in addition to the Personal Information listed above, we may also collect and process the following Personal Information:
1. Family Information—such as name(s) and contact information of your partners, children, or other family members.
  2. Background screening—such as criminal and financial background checks.
  3. Educational Information—such as school, professional training, certification, and qualifications, and related information.
  4. Financial, Health, and Benefits Information—such as compensation, payroll data, tax information, bank account information, health, dental, and vision claims and/or information, disability and life insurance claims, unemployment, or retirement account information, and other types of benefits fulfillment information.

5. Valvoline Specific Employment Information—such as screening, job title, office location, business activities, performance evaluation, or work-related contacts and communications.
6. Vehicle and Driving Information—such as information about your use of business vehicles, machinery, and equipment, and information about your personal vehicle information when parked on Valvoline owned property.
7. Biometric Information—such as fingerprints, voiceprints, or photos.
8. Information required to fulfill legal obligations—such as child support obligations, worker’s compensation, unemployment, and other similar information.

From time to time, laws and regulations may require us to collect additional categories of Personal Information from you.

## **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.

1. From you directly, or from other authorized parties acting on your behalf, through physical (e.g., account creation, us providing a product or service to you, visitor registration when you visit our office), audio (e.g., phone), visual (e.g., Closed Circuit Television monitoring when you visit a Valvoline property), or electronic (e.g., 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.
2. Through referrals. Occasionally, visitors will have the opportunity to forward information to others through our Online Services (or interactive advertisements). The personal referral 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 information for other purposes, such as for analysis to better serve our customers.
3. From public records made available by federal, state, or local government entities or widely available sources made available by media.
4. From Social Media Platforms. We may collect 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.

5. Third parties that provide data to support our business and operational activities or human resources and workforce management activities. Such third parties may include our Affiliates, business partners, manufacturers, vendors, dealers, credit bureaus, employee benefit providers, and suppliers who provide goods and services to us.

## 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.

In the last 12 months Valvoline has collected and processed Personal Information for the following purposes in different contexts:

<b>Purpose of Collection and Processing</b>	<b>Examples</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.</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> </ul>
Advertise, market, and promote our products and Services	<ul style="list-style-type: none"> <li>• Promote and Market our products and services.</li> <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, Rebates.</li> </ul>

<p>Determination of credit for product fulfillment and entering into a business relationship with you.</p>	<ul style="list-style-type: none"> <li>• Process financial applications, assess your eligibility for our products and services and verify your identity.</li> <li>• Perform integrity screening and credit checks to determine the amount of product we will allow you based on credit.</li> <li>• Determination of whether we are willing to accept a Franchise application or other business partnership arrangement.</li> </ul>
<p>Support business operations, including to meet risk, legal, and compliance requirements</p>	<ul style="list-style-type: none"> <li>• Conduct audits and compliance assessments.</li> <li>• Fulfill legal or regulatory inquiry or assessment.</li> <li>• Identify risk.</li> <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>Support employment, human resources, and operational management</p>	<ul style="list-style-type: none"> <li>• Provide employment benefits and other employment-related services to employees and dependents.</li> <li>• Manage payroll and compensation activities.</li> <li>• Process employment applications.</li> <li>• Manage and operate our facilities and infrastructure.</li> </ul>

## 7.) When and To Whom Does Valvoline Disclose Information to Others?

We may disclose the information we process, identified in section 4, in the following ways:

1. **Business Operations.** To Service Providers, Vendors, and other third parties who help us operate our business, provide our Online Services, other services, and communications on our behalf. Including third parties who help us develop and promote products and services, including joint marketing, or to help us customize advertisements, offers, or other communications to you.
2. **Affiliations and Other Ventures.** We may share information with our corporate affiliates and franchisees for their everyday business purposes, to provide services or to perform marketing. We may also participate in joint ventures with

others, and we may share information with other selected third parties. For example, we may exchange information with third parties regarding vehicle details and service history.

3. **Business Transfer.** We may disclose Personal Information in connection with the sale or merger of our business, acquisition of a business, or the transfer of assets including in a bankruptcy action.
4. **Protection of Ourselves and Others.** We may use and share personal information to protect our own and others' rights and property, including protection of our affiliates, franchisees, customers, and members of the public. We may use and share the information we gather to comply with law (including cooperation with regulators or officials), legal process (including in response to legal process) or legal advice, and for preventing fraud, theft, and injury to you, us, or others.

#### **8.) 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. You may be able to opt-out of this use of information about you by Google by clicking [here](#) to manage Google ad settings. To learn more about how Google uses data when you use our Online Services, please click [here](#). 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 [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices). (Note that you will still receive advertising even after opting-out but such advertising may be less targeted to your interests and preferences.)

Valvoline has control over targeted advertising through our enhanced online display advertising provided directly by Valvoline Instant Oil Change [here](#).

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

Yes, however, you can limit our tracking.

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. Some of this information is not capable of identifying you but some information can be associated with you, your browser, or your device. 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. You control whether and to what extent tracking on our platforms happens. Valvoline abides by your choices.

You control whether this tracking happens in one of two ways:



1. Valvoline embeds tracking choices technology (Cookie and Consent Banners) into our Online Services that allow tracking.

From our Consent Banner you choose the tracking you allow. Understand that your choices may impact your experience while using our Online Services. You cannot opt-out of Valvoline's First Party, Strictly Necessary Technologies as they are deployed in order to ensure the proper functioning of our Online Services (for example, prompting the cookie and consent banner and remembering your settings, to log into your account, to redirect you when you log out, etc.).

You can make changes at any time by visiting the [Linked Cookie Banner Tool].

2. We abide by Global Privacy Controls.

Your browser and your device may provide you the option to limit the use of cookies or other Data Technologies. You should consult documentation for your browser or device for more information. To find out more about cookies, including how to manage and delete cookies on your browser, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 10.) 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.

Valvoline utilizes third party marketing and advertising service providers that in some cases provide location data of their users. Valvoline does not control whether third parties collect this data.

## 11.) 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.

1. **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 able to help update information about you.
2. **Unsubscribe from Email 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 email from us. We will abide by this choice. You can also

remove your information from our email and physical mail marketing list by contacting our Customer Service team at 1-800-FAST- CHANGE (800-327-8242).

## **12.) 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. We also take reasonable steps to ensure that Personally Identifiable Information collected is reliable for its intended use, accurate, complete, and current. 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 Privacy Notice should a reasonable safeguard be circumvented, ineffective, or otherwise fail.

## **13.) Notice to Minors**

Our Online Services, Services, and Communications are not intended to entice or solicit information from minors. Users of our Services, Online services, or Communications under the age of sixteen (16) should not provide any Personal Information to us. If you are a minor, do not engage our Online Services, Services, or Communications and do not provide us Personal Information. Consistent with the requirements of the United States' Children's Online Privacy Protection Act ("COPPA"), if we learn that we have received information directly from a child under age 13 without first receiving his or her parent or guardian's verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use the Online Services, Services, or Communication. We will subsequently delete the information obtained from the minor.

If you are a parent or guardian and you believe that your child under the age of sixteen (16) has provided us with Personal Information without your consent, please contact us at [privacy@valvoline.com](mailto:privacy@valvoline.com).

## **14.) 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 or longer than is reasonably necessary.

## **15.) Jurisdictional Information**

### **1. Sale of Data, Targeting, and Ability to Opt-Out**

Valvoline is not in the business of selling Personal Information. We are, however, in the business of providing our customers with a holistic approach to their vehicle and its

maintenance and in some instances, we partner with others to do this. This section describes how we share and sell personal information identified by law to be a “sale”, “sharing”, or “targeting”, and how you can opt-out under applicable law. Outside of the identified contexts below, there may be projects or experiences in which you may allow us to sell or share your data. In these contexts, we will gain your consent.

**a. Residents of Nevada**

Nevada’s data privacy law defines selling Personal Information as exchanging it for money. We do not sell the Personal Information of residents of Nevada.

**b. Residents of Virginia**

The Virginia Consumer Data Privacy Act defines “sale” as exchange of personal data for monetary consideration by the controller to a third party. We do not sell the Personal Information of residents of Virginia.

**c. Residents of California, Connecticut, and Colorado**

The laws in California, Connecticut, and Colorado define “sale” as the exchange of Personal Information belonging to residents of each respective state for money or other valuable consideration.

Under these jurisdictions, Valvoline engages in the “sale” of Personal Information in two ways.

- i. We utilize data analytics tools and provide information received from tracking technology (see sections 8 and 9 above) to better understand and market to individuals interested in our products and services. Valvoline does not have control over your tracking preferences. To opt out of this sale, set your tracking preferences on our Online Services, on your mobile device, or browser.
- ii. We have a mutual feed with CarFax. We provide VIN number and vehicle service history performed by Valvoline to CarFax and in return CarFax helps us recommend services and products by providing information about your vehicles service history not performed by Valvoline to us. You can opt-out of this “sale” by completing a “Do Not Sell” request. Opting out of the CarFax disclosure means we won't be able to look at your vehicle's service history and we can't share service history with CarFax. Note: Only VIN and vehicle service records are shared with CarFax. No personal information is shared with CarFax.

**2. What Rights Do Consumers in California, Connecticut, Colorado, and Virginia Have?**

1. Request that we disclose
  - a. The categories of Personal Information collected about you.
  - b. The categories of sources from which your Personal Information is collected.
  - c. The business or commercial purpose for collecting your Personal Information.
  - d. The categories of third parties to whom Personal Information is disclosed, and the categories of Personal Information disclosed.
  - e. The specific pieces of Personal Information collected about you.
2. Request that Personal Information collected about you be deleted.
3. Request that your inaccurate Personal Information be corrected.
4. Request a copy of your Personal Information held by Valvoline.
5. Request that Valvoline not sell your Personal Information, as stated above.
6. Request that Valvoline not share your information for cross contextual or behavioral advertising or targeting.
7. Be free from discrimination by Valvoline for exercising your privacy rights.
8. You have the right to complain and request an appeal our decision.

**Authorized Agents:** If you are a California or Connecticut resident, you may authorize an agent to make a request on your behalf. If you are making a request as an authorized agent, we may request that you provide documentation to confirm that you are authorized to make the request on behalf of another.

**Verification:** Valvoline takes reasonable steps to ensure that we are fulfilling the correct individual's requests. Our Verification Process involves matching information provided during the privacy request with information within our systems. Our process is to match at least 3 data points from the consumer to ensure we have correctly matched the individual to their Personal Information.

**How to Request Rights Fulfillment:** To request fulfillment of your rights, please [complete our form](#). This creates a secure and private communication mechanism between Valvoline and you.

**Denials of Deletion Requests:** We may deny your deletion request if retaining your Personal Information is necessary for us or our service providers to:

1. Complete the transaction for which we collected your Personal Information, provide goods or services that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

3. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.
4. Comply with legal obligations, laws, and regulations, including certain exemptions under CCPA.

**Denials of All Other Types of Privacy Rights Requests:** We may deny your request if it is fraudulent, excessive, repetitive, harassing, or manifestly unfounded.

**Do Not Sell/ Do Not Share:** We will honor a request not to sell your Personal Information where the power to do so is within our control and we are required to do so.

**Complaints and Appeals:** You can make a complaint or request that we review your request again (appeal) by submitting or responding within our secure portal.

**Profiling:** Valvoline does not use Personal Information for profiling individuals in furtherance of decisions that produce legal or similarly significant effects.

**Sensitive Data and Special Categories:** Valvoline utilizes categories of data which are classified sensitive or special by current legal standards (hereinafter Sensitive Data) in limited ways. Valvoline does not sell such data. We retain Sensitive Data in accordance with our records retention policy and as required by law.

<b>Category of Individual</b>	<b>Sensitive/ Special Data Elements</b>	<b>Examples of Data Use</b>
Employees/ Job Applicants:	<ul style="list-style-type: none"> <li>• Contents of employee’s Valvoline owned email</li> <li>• Contents of employee’s Valvoline owned cell phone including SMS messages</li> <li>• Usernames and passwords for your Valvoline Accounts</li> <li>• Country of Origin/ Citizenship/ Ethnicity/Race</li> <li>• Financial account number/Corporate Credit Card Number</li> <li>• Medical/ Health Information/ Health Insurance Information</li> <li>• Government Issued Identification/ Military Identification/ Passport/ Driver’s License/ SSN</li> <li>• Religion/ Philosophical Beliefs</li> <li>• Precise Geolocation of company owned vehicles and devices linked to you.</li> <li>• Trade Union Membership</li> </ul>	<p>Valvoline uses these sensitive data in the context of your employment with Valvoline.</p> <ul style="list-style-type: none"> <li>• To operate and manage our business and infrastructure.</li> <li>• Provide employment benefits and other employment-related services to employees and dependents.</li> <li>• Manage payroll and compensation activities.</li> <li>• Process employment applications including government requirements.</li> <li>• Performing background checks and complying with legal requirements.</li> </ul>
Business to Business	<ul style="list-style-type: none"> <li>• Driver’s License</li> <li>• Financial Account Number</li> <li>• Government Issued ID, Passport, SSN, TIN</li> <li>• Username and Password for your Valvoline Accounts</li> </ul>	<p>Valvoline uses sensitive data gained in the Business-to-Business Context.</p> <ul style="list-style-type: none"> <li>• Determination of credit for product fulfillment and entering into a business relationship with you.</li> <li>• To operate and manage our business.</li> </ul>
End User Customers	<ul style="list-style-type: none"> <li>• Credit/ Debit Card Numbers</li> <li>• Precise Geolocation</li> <li>• Username and Password</li> <li>• Country of Origin</li> </ul>	<p>Valvoline uses our End User Customer’s data in specific ways related to our services.</p>

		<ul style="list-style-type: none"> <li>• Process payments for the purchase you have made.</li> <li>• Process location-based services when requested (i.e., when you request your nearest store).</li> <li>• Allow you access to your account you have with us.</li> <li>• To determine what language to provide our Services, Online services, and Communications in.</li> </ul>
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**16.) 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 [Privacy@Valvoline.com](mailto:Privacy@Valvoline.com).

To exercise your privacy rights or to file a privacy- related complaint or appeal follow the instruction in this Notice. You may also contact the Privacy Team by email at [Privacy@Valvoline.com](mailto:Privacy@Valvoline.com) or contact Customer Care at 1-800- FAST CHANGE (800-327-8242).

**17.) Privacy Notices:**

View or download the current version of the Privacy Notice (PDF)