

Privacy Policy

Last modified: May 15, 2023

1. Introduction

Softrams, LLC, a Virginia limited liability company ("**Company**" or "**We**"), respects your privacy and is committed to protecting it through our compliance with this privacy policy (this "**Privacy Policy**").

This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit the website <https://jobring.ai> (our "**Website**") or Job Ring (the "**Platform**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy applies to all users of the Website or the Platform, including entities and individuals that post job postings (each, a "**Posting**") through the Website or the Platform.

This Privacy Policy applies to information we collect:

- a. On this Website and the Platform.
- b. In email, text, and other electronic messages between you and this Website or the Platform.
- c. When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- d. The Company offline or through any other means, including on any other website operated by the Company or any third-party (including our affiliates and subsidiaries); or
- e. Any third-party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or through the Website or the Platform.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with the policies and practices contained in this Privacy Policy, your choice is not to use our Website or the Platform. By accessing or using this Website or the Platform, you agree to this Privacy Policy. This Privacy Policy may change from time to



time. Your continued use of this Website or the Platform after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

Please remember that your use of the Website and the Platform is also subject to our Terms of Use.

If you wish to access, update, or request additional information on the use of your Personal Information collected via this Website or Platform or if you have any questions about our Website, services, or this Privacy Policy, use the [Customer Support](#) form.

2. **Information We Collect**

We collect several types of information from and about users of our Website and the Platform. The information we collect falls into three categories:

- a. information you provide to us (the "**Application Materials**");
- b. information we collect through automated methods when you use our services; and
- c. information we collect from other sources.

Generally, you are under no obligation to provide your personal information. In certain cases, however, the Company may be unable to provide you with our services unless you provide your personal information.

d. ***Information You Provide to Us***

We collect information on or through our Website or through the Platform, which may include:

- i. Information that you provide by completing or filling in forms on our Website or the Platform, including information provided at the time of registering or creating an Account to use our Website or the Platform, posting material, or requesting further services. We may also ask you for information when you report a problem with our Website or the Platform.
- ii. If you refer (each, a "**Referral**") a potential candidate (each, a "**Candidate**") for a Posting on the Website or the Platform, we will collect the information you provide in the Referral, including the name, contact information, and other information about you and the Candidate, including your relationship with the Candidate and



the Candidate's credentials and qualifications with respect to the Posting.

- iii. Records and copies of your correspondence (including email addresses), if you contact us.
- iv. Details of transactions you carry out through our Website or the Platform. You may be required to provide financial information before posting a Posting to, or making a Referral through, our Website or the Platform.
- v. Your search queries on the Website or the Platform.

You also may provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Website or the Platform, including Postings, or transmitted to other users of the Website or Platform or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Although you may set certain privacy settings for such information by logging into your Account, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website or the Platform with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons. The specific information we collect through the voluntary forms that users of the Website or Platform fill out, may include the following:

- vi. First Name;
 - vii. Last Name;
 - viii. Email Address;
 - ix. Postal Address;
 - x. Company;
 - xi. Phone Number; and
 - xii. Any other identifier you provide that may be used to contact you either online or offline.
- e. ***Information We Collect Through Automated Methods***

As you navigate through and interact with our Website or the Platform, we may use automatic data collection technologies to collect certain



information about your equipment, browsing actions, and patterns, including:

- i. Details of your visits to our Website or the Platform, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website or the Platform.
- ii. Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

OPT-OUT: Contact us using the [Customer Support](#) form for information on how you can opt out of behavioral tracking on this Website and the Platform and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

The information we collect automatically may include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and the Platform and to deliver a better and more personalized service, including by enabling us to:

- iii. Estimate our audience size and usage patterns.
- iv. Store information about your preferences, allowing us to customize our Website and the Platform according to your individual interests.
- v. Speed up your searches.
- vi. Recognize you when you return to our Website or the Platform.

The technologies we use for this automatic data collection may include:

- vii. **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website or the Platform. Unless you have adjusted your browser setting so that it will refuse cookies, our



system will issue cookies when you direct your browser to our Website or the Platform.

- viii. **Web Beacons.** Pages of our Website, the Platform, and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- ix. **Flash Cookies.** Certain features of our Website or the Platform may use local stored objects (or Flash cookies) to collect and store information about your preferences or navigation to, from, or on our Website or the Platform. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see **10. Choices About How We Use and Disclose Your Information.**

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

We retain such information until it is no longer necessary to fulfill the purpose it is being used for, as required by applicable laws, or until you ask us to delete it.

3. **Children Under the Age of 16**

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any personal information to or on the Website or the Platform. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or the Platform or through any of their respective features, register or create an account on the Website or the Platform (an "**Account**"), use any of the interactive or public comment features of this Website or the Platform, or provide any information about yourself or any other person to us, including your, or any other person's, name, address, telephone number, email address, or any screen name or user name you or such other person may use. If we learn we have collected or



received personal information from a child under 16, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us via the [Customer Support](#) form.

4. **Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications, including advertisements, on the Website or the Platform are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use the Website or the Platform. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see **10. Choices About How We Use and Disclose Your Information.**

5. **Logging In from Third-Party Websites**

If you do not already have Account, but log in to the Website or the Platform using a third-party website or credentials, such as LinkedIn or GitHub, this creates an Account using the same email address used in your LinkedIn or GitHub account, as applicable. If you agree to provide this information to us, LinkedIn, GitHub or such other third-party will authenticate you and redirect you to us. Please note, when you log in to the Website or the Platform using a third-party account, such third-party will use cookies in order to authenticate you as a user of such third-party's services.

By accessing the Website or the Platform through your LinkedIn or GitHub account, you understand that LinkedIn or GitHub will share certain personal information for the purposes of authentication to permit you to access the Website and the Platform in a secure manner. If you no longer wish to share data with us from your LinkedIn or GitHub account, you will need to adjust your



LinkedIn or GitHub account settings. Information passed from LinkedIn or GitHub to us will be considered our account information for purposes of your use of the Website and the Platform.

You have the ability to disable the connection between your LinkedIn or GitHub account and your Account at any time by accessing your privacy settings on your LinkedIn or GitHub account. LinkedIn or GitHub may also ask for your permission to share certain other details with us, including but not limited to your name, profile picture, public profile information, and email address. Once you give this permission, the requested information will be shared with us. This information will be used to provide services to you, including populating your Account. The shared information will remain associated with your Account until you modify or delete it.

6. **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- a. To present our Website and the Platform and their contents to you.
- b. To provide you with information or services that you request from us.
- c. To fulfill any other purpose for which you provide it.
- d. To provide you with notices about your Account.
- e. To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- f. To notify you about changes to our Website, the Platform, or any products or services we offer or provide through it.
- g. To allow you to participate in interactive features on our Website or the Platform.
- h. In any other way we may describe when you provide the information.
- i. For any other purpose with your consent.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on, or otherwise interact with, an advertisement, the advertiser may assume that you meet its target criteria.



7. **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- a. To our subsidiaries and affiliates.
- b. To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- c. To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about users of the Website or Platform is among the assets transferred.
- d. To fulfill the purpose for which you provide it. For example, if you make a Referral through the Website or the Platform, we will transmit the contents of the Referral and your email address to the Employer with respect to the applicable Posting.
- e. For any other purpose disclosed by us when you provide the information.
- f. With your consent.

We may also disclose your personal information:

- g. To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- h. To enforce or apply our Terms of Use and other agreements, including for billing and collection purposes.
- i. If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others.

8. **Transfers of Information to Employers**

We send personal information to Employers, including, in connection with Referrals and the submission of Application Materials; however, we will only transfer personal information of a Candidate in connection with a Referral if such



Candidate submits Application Materials to such Employer in connection with a Posting. Such transfers are performed in the course of the job search, application, interview, and hiring process. Personal Information transferred to Employers in this way is processed in accordance with our Terms of Use and Privacy Policy and those of the applicable Employer.

Employers agree to comply with all their responsibilities under applicable data protection rules with respect to the collection, processing and storage of personal information, as well as providing adequate protection of all data rights provided for under all applicable data protection rules.

9. **Transfers of Information to Candidates**

We send certain information to Candidates in connection with Referrals, including the information provided in the Referral and the source of the Referral. In addition, we may provide the name of the Employer, the Employer representative's name, the Employer's location, whether the Employer has taken or has chosen not to take an action with regard to the Candidate's Application Materials, such as opening, viewing, responding to or making a decision in regard to such Candidate or such Candidate's Application Materials, whether the Employer has engaged with other Candidates or viewed other Candidates' resumes, and whether the Employer has taken an action in regard to a Posting such as pausing or closing it. We do this in order to help Candidates evaluate employment opportunities. As an Employer, when you use the Website or the Platform (for example by posting a Posting or contacting a Candidate) you agree that we may provide this information to Candidates.

10. **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- a. **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.



- b. **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by checking the relevant box located on the form on which we collect your data. You can also always opt-out by logging into the Website or the Platform and adjusting your user preferences in your Account and checking or unchecking the relevant boxes.
- c. **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by logging into the Website or the Platform and adjusting your user preferences in your Account and checking or unchecking the relevant boxes.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third-parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

11. **Accessing and Correcting Your Information**

You can review and change your personal information by logging into the Website or the Platform and visiting your Account profile page.

You may also contact us via the [Customer Support](#) form to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your Account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Website or the Platform, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Website users. Proper access to, and use of, information provided on the Website or the Platform, including User Contributions, is governed by our [Terms of Use](#).

12. **Your State Privacy Rights**



State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about California residents' privacy rights, visit the [California Privacy Protection Agency \(CPPA\) Website](#).

Colorado, Connecticut, Utah, and Virginia each provide their state residents with rights to:

- a. Confirm whether we process their personal information.
- b. Access and delete certain personal information.
- c. Request their data in a readily usable format.

Opt-out of personal data processing for targeted advertising and sales. Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- d. Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
- e. Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

Virginia, Colorado and Connecticut also provides their state residents with the right to:

- f. Opt-in for the processing of certain sensitive day which may include racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, genetic or biometric data, data from a child, and precise geolocation data.

Utah state residents have the right to opt-out of the process of certain sensitive data that may include racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, genetic or biometric data, data from a child, and precise geolocation data.

To exercise any of these rights, please submit a request via the [Customer Support](#) form.

To appeal a decision regarding a consumer rights request, please submit a request via the [Customer Support](#) form.

13. **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers



behind firewalls. Any payment transactions are facilitated through a third-party payment processor. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website and the Platform, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website or the Platform. The information you share in public areas may be viewed by any user of the Website or the Platform.

Unfortunately, the transmission of information via the internet cannot be guaranteed to be completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website or the Platform. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website or the Platform.

14. **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our Privacy Policy on this page with a notice that the Privacy Policy has been updated on the Website and Platform home page. If we make material changes to how we treat our users' personal information, we will notify you by email to the primary email address specified in your Account and through a notice on the Website home page and the Platform. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website, the Platform, and this Privacy Policy to check for any changes.

15. **Contact Information**

To ask questions or comment about this Privacy Policy or our privacy practices, contact us via the [Customer Support](#) form.



Privacy Policy For California Residents

Last modified: March 17, 2023

This Privacy Policy for California residents supplements the information contained in any privacy related policies of Softrams, LLC, a Virginia limited liability company ("**Company**" or "**We**") and applies solely to visitors, users, and others who reside in the State of California ("**consumers**" or "**you**"). We have adopted this notice to comply with the California Consumer Privacy Act of 2018 ("**CCPA**"), the California Privacy Rights Act ("**CPRA**"), and other California privacy laws. Any terms defined in the CCPA and CPRA have the same meaning when used in this notice.

1. Personal Information We Collect

The CCPA and CPRA define "Personal information" as information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer or household. Under the CPRA, "Personal Information" further includes "Sensitive Personal Information" such as social security number, driver license number, state identification card, passport number, financial data, genetic data, biometric data, precise geolocation, and racial and ethnic origin, content of consumer communications (email, mail, or text), unless the business is the intended recipient, genetic data, and information collected concerning a consumer's health, sex life, or sexual orientation.

Personal Information does not include:

- a. Publicly available information from government records.
- b. De-identified or aggregated consumer information.
- c. Other regulated information that is excluded from the CPRA's scope, such as:
 - i. health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;



- ii. 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.

We may collect Personal Information from you in different ways and for different purposes. The types of Personal Information we collect will depend on your interaction with the Website or Platform (as defined in the Privacy Policy), including the types of products or services you use and what you do on our website (e.g., apply for a job). The below section includes the categories of Personal Information that we may have collected within the last twelve (12) months or may collect and includes the examples of Personal Information under each category:

| Category | Examples | Collected |
|---|--|-----------|
| A. Identifiers. | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers. | YES |
| B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories. | YES |
| 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). | YES |
| D. Commercial information. | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | NO |
| E. Biometric information. | Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a | NO |



| | | |
|---|--|------|
| | template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data. | |
| F. Internet or other similar network activity. | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. | YES |
| G. Geolocation data. | Physical location or movements. | NO |
| H. Sensory data. | Audio, electronic, visual, thermal, olfactory, or similar information. | NO |
| I. Professional or employment-related information. | Current or past job history or performance evaluations. | YES |
| 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 |
| L. Sensitive Personal Information | Identifiers listed in the preceding category B and precise geolocation, racial and ethnic origin (when hired for a position). | YES* |

"*" - Sensitive Personal Information may be collected when you apply for a job on our website.

2. How Is Personal Information Collected

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

- a. Directly from individuals filling out forms and creating an account on the Website or Platform.
- b. Directly and indirectly from activity on our websites. For example, from submissions through website portals or website usage details collected automatically.



- c. From third-parties that interact with us in connection with the services we perform. For example, recruitment agencies or other contractors used in connection with human resources.

3. **Use Of Personal Information**

We may use or disclose the Personal Information We Collect for one or more of the following business purposes:

- a. To fulfill or meet the reason for which the information is provided.
- b. To provide you with information, products or services that you request from us.
- c. To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- d. To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- e. To improve our website and present its contents to you.
- f. For testing, research, analysis and product development.
- g. As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- h. To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- i. As described to you when collecting your personal information or as otherwise set forth in the CCPA/CPRA.
- j. To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

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.

4. **Use Of Sensitive Personal Information**



We may use or disclose the Sensitive Personal Information we collect for one or more of the following business purposes:

- a. To evaluate job applications and job applicants
- b. For the business or employment purpose for which the information was collected or shared

5. **Sharing Personal Information**

We may disclose your Personal Information 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. 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 categories.

Category C: Protected classification characteristics under California or federal law.

Category I: Professional or employment-related information.

Category L: Sensitive Personal Information

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

- a. Our affiliates.
- b. Service providers.
- c. Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

6. **Your Rights**

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

- a. ***Right to Access***



You have the right to know the information contained in this policy and our website Privacy Policy, and to request access to a copy of the Personal Information that we have collected about you directly or indirectly, including Personal Information collected by a service provider or contractor on our behalf.

b. ***Request to Know***

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 12 months. Once we receive and confirm your verifiable consumer request to know, we will disclose to you:

- i. The categories of Personal Information we collected about you.
- ii. The categories of sources for the Personal Information we collected about you.
- iii. Our business or commercial purpose for collecting that Personal Information.
- iv. The categories of third parties with whom we share that Personal Information.
- v. The specific pieces of Personal Information we collected about you.
- vi. If we disclosed your Personal Information for a business purpose, the Personal Information categories that each category of recipient obtained.

c. ***Request 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 to delete, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We may deny your request to delete if retaining the information is necessary for us or our service providers to:

- i. 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, or otherwise perform our contract with you.

- ii. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - iii. Debug products to identify and repair errors that impair existing intended functionality.
 - iv. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
 - v. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
 - vi. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
 - vii. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
 - viii. Comply with a legal obligation.
 - ix. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.
- d. ***Right to Correct***

In certain circumstances, you have the right to request correction of any inaccurate personal information.

- e. ***Right to Opt-Out/Do Not Sell Personal Information***

We do not sell your Personal Information for monetary or other valuable consideration.

We do not share your Personal Information for the purposes of cross-context behavioral advertising. Cross-context behavioral advertising under the CPRA is "the targeting of advertising to a consumer based on the



consumer's personal information obtained from the consumer's activity across businesses, distinctly-branded websites, applications, or services, other than the business, distinctly-branded website, application, or service with which the consumer intentionally interacts.

f. ***Right to Limit the Use of Sensitive Personal Information***

We limit our use of Sensitive Personal Information to only the purposes necessary to perform covered services, and for certain business and commercial purposes described above.

g. ***Right to Non-Discrimination***

We will not discriminate against you for exercising any of your CCPA/CPRA rights. Unless permitted by the CCPA/CPRA, we will not:

- i. Deny you goods or services.
- ii. Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- iii. Provide you a different level or quality of goods or services.
- iv. Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

h. ***Exercising Your Rights***

To exercise your rights to requests described above, please submit a verifiable consumer request to us by using the [Customer Support](#) form and mention "California Rights Request" in the description.

Only you or a person legally authorized to act on your behalf, may make a verifiable consumer request to know or request to delete. You may also make a verifiable consumer request on behalf of your minor child.

A 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.
- ii. Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.



You may only make a verifiable consumer request to know twice within a 12-month period.

We cannot respond to your request to know or request to delete 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 the requestor's identity or authority to make the request. Depending on your type of request or the information requested by you, we may require additional information in order to verify your identity and fulfil your request.

To verify your identity, we will ask that you provide the following information when you submit your request:

- iii. First Name,
- iv. Last Name,
- v. Email Address,
- vi. Mobile Phone Number,
- vii. Address,
- viii. City,
- ix. State,
- x. Zip Code, and
- xi. a brief description of your relationship with the Company and the nature of your request.

We will only use this information to confirm your identity. If we cannot successfully verify your identity, we will inform you of that fact.

i. ***Response Timing and Format***

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please use the [Customer Support](#) form. We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. 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 do not charge a fee to process or respond to your verifiable consumer request to know or request to delete 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.

7. **Requesting Notice In Alternative Format/Language**

You may be able to request this Notice in another language where we provide such notices in the ordinary course of business or in an alternative format if you have a disability. Please use the [Customer Support](#) form to request an alternative format.

8. **Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not share your information with third parties for their direct marketing purposes.

9. **Changes To Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time.

10. **Contact Information**

If you have any questions or comments about this notice, 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 use the [Customer Support](#) form.