

California Consumer Privacy Act of 2018 ("CCPA") Notice

The CCPA provides consumers (California residents) with specific rights about their personal information. The CCPA is applicable to the personal information APR Consulting ("APR") collects from you. This section describes your CCPA rights and explains how to exercise those rights.

Personal Information We Collect, Use, Disclose, or Sell

APR collects information that identifies, relates to, describes, is reasonably capable of being associate with, or could be linked (directly or indirectly), with you or your household. APR may collect the following categories of information, and share such categories with third parties.

APR has collected the following categories of from its consumers within the last twelve (12) months.

- Identifiers: examples include, but are not limited to, a real name, alias, postal address, email address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, current or past job history, or other similar identifiers.
- Categories of Personal Information Identified in the California Customer Records Statute (Cal. Civ. Code 1798.80): examples include, but are not limited to, a name, signature, social security number, address, telephone number, driver's license or state identification card number, insurance policy number, education, employment information including history, financial information including bank account number, medical information, or health information.
- Characteristics of protected classifications under California or federal law: examples include, but are not limited to, age, citizenship, marital status, medical condition, physical or mental disability, gender, veteran or military status.
- Commercial information: examples include, but are not limited to, records of personal property, products or services purchase, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Biometric Information: examples include, but are not limited to, telephone voice recordings, photographic images, sleep, health, or exercise information to the extent "biometric information" is defined by the CCPA.
- Internet or other electronic network activity information: examples include, but are not limited to, browsing history, search history, information regarding a consumer's interaction with a website, application, or advertisement.
- Audio, electronic, visual, thermal, olfactory, or other similar information: examples include, but are not limited to, photographs, or recordings of telephone calls.
- Professional or employment-related information: examples include, but are not limited to, employer name, positions held, physical demands of positions held, and salary information.
- Non-public information (as defined in the Family Education Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99)): examples include, but are not limited to, education records and transcripts.



- Usage: examples include, but are not limited to, information on your interaction with APR.
- Geolocation Data: examples include, but are not limited to, physical location.
- Inference drawn from other personal information: examples include, but are not limited to, information used to create a profile about a consumer based on the following information reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Third Parties With Whom Information May be Shared With

APR may work with third parties that provide services to us to help us develop, operate, deliver, maintain, improve, and enhance our services to you. APR may share your personal information with third parties for marketing purposes. APR may share your information to comply with the law, respond to valid government inquiries, comply with legal processes, and to permit APR to pursuing available remedies or limit damages.

Purpose for Collecting Personal Information

We may disclose the personal information we collect from you for the follow reasons:

- To fulfill or meet the reasons you provided the information.
- To provide support, personalize, and develop our website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To monitor, analyze, and research, such as trends, usage, and advertising-related services.

To provide you with support and to response to your inquiries, including investigating and addressing your concerns, and monitoring and improving our responses.

Access to Specific Information

You have the right to request that APR 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 identity (see *Exercising Access, Data Portability, and Deletion Rights*), we will disclose to you:

- The type of personal information we have collected about you.
- The type of sources for the personal information we collected about you.
- Our business reasons for collecting personal information.
- Third parties that we may share that personal information with.
- The specific pieces of information we collect about you.



Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless allowed by the CCPA, we will not take any of the following measures for exercising your CCPA rights:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including granting discounts or other benefits, or imposing penalties.
- Provide you different levels of quality of goods or services.
- Suggest you may receive a different price or rate for goods or services.

However, we may offer you certain financial incentives allowed by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we may offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

Exercising Access, Data Portability, and Deletion Rights

To exercise your access, data portability, and deletion rights described above, please submit a verifiable consumer request by calling us at 909-396-5375 or emailing us at <u>hrgroup@aprconsulting.com</u>.

You, or a person registered with the California Secretary of State you authorize to act on your behalf, may make a verifiable consumer request about your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data twice within a 12-month period. If you make a request, APR will try provide you with the requested data within 45 days, although circumstances may require more time. APR will also provide you your information in a generally usable format to allow you to easily transmit the information. Your request must: provide enough information that allows APR to reasonably verify you are the person whom we collected personal information, and describe your request with enough detail that allows us to properly understand, evaluate, and respond to it.

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. We will only use the personal information provided in a verifiable consumer request to verify the requestor's identity or the identity of the person with authority to make the request.

To the extent that your data is protected by the CCPA, you have the right to request that we delete your personal information. California law, however, allows APR to retain your personal information under certain conditions, even if you have asked us to delete it. In those situations, APR will retain that



information. Instances in which APR may retain your information include, but are not limited to: providing you with goods or services; detecting or resolving security or functionality-related issues; comply with local, state, or federal law; conduct research in the public interest; protecting the right to free speech; and carrying out for internal reasons that you may reasonably expect from APR.

Sale and Disclosure of Personal Information

In the preceding twelve (12) months, APR has not "sold" personal information subject to the CCPA. For the purposes of this disclosure, "sold" means the disclosure of personal information to a third-party for monetary or other valuable consideration.

In the preceding twelve (12) months, APR has disclosed the following categories of personal information for business reasons: [e.g. auditing, security, debugging, short-term use, performing customer services, internal research, testing or improvement]

Changes to APR's Privacy Notice

APR retains the right to amend this privacy notice at any time.