

California Consumer Privacy Rights Notice

Regology Inc.

Effective December 1, 2020

This California Consumer Privacy Rights Notice (“Notice”) sets forth Regology, Inc.’s (“Regology”) disclosure obligations under California law, including the California Consumer Privacy Act of 2018 (“CCPA”) and California Civil Code section 1798.83. This Notice provides additional details regarding the information defined as ‘personal information’ under applicable California law and related to a California resident or household (“Consumers” and “You”) further referred to as “Personal Information.”

1. Personal Information Collected and Disclosed

Regology collects, uses and/or discloses Personal Information as follows:

Personal Information Collected, Used and/or Disclosed for Business Purpose in Preceding 12 Months					
CCPA Category	Collected?	Source of Collection	Business Purpose	Disclosed or Shared for a Business Purpose?	Purpose of Disclosure
Category A Identifiers & B Personal Information					
• Name/Alias	Yes	You	Account Creation; Payment Processing; Customer Support	Yes; Service Provider	Account Verification; Payment Processing; Support Communications
• Email	Yes	You	Account Creation; Opt-in requests for information; Service, Support & Marketing Communications	Yes; Service Provider	Account Verification; Service, Support & Marketing Communications
• Address	Yes	You	Payment Processing	Yes; Service Provider	Payment Processing
• Cell or Telephone #	No	N/A	N/A	N/A	N/A
• Unique/Online ID (cookies)	Yes	Device	Services Analytics; Auditing; Data Security; Performing & Maintaining Services	Yes; Service Provider	Services Analytics; Auditing; Data Security; Performing & Maintaining Services
• IP Address	Yes	Device; Service	Program Analytics	Yes;	Services Analytics;

		Provider	Auditing; Data Security; Performing & Maintaining Services	Service Provider	Auditing; Data Security; Performing & Maintaining Services
• Credit or Debit Card # /ACH	Yes	You * stored as token only	Payment Processing	Yes; Service Provider * token only exchanged	Payment Processing
<u>Category C: Protected Characteristics</u>	N/A	N/A	N/A	N/A	N/A
<u>Category D: Commercial Information</u>					
• Products/Services Purchased- Obtained-Considered	Yes	Device	Site Analytics; Maintaining Services	Yes; Service Provider	Site Analytics; Maintaining Services
• Purchasing history/tendencies	Yes	You/Device	Site Analytics; Maintaining Services	Yes; Service Provider	Site Analytics; Maintaining Services
<u>Category E: Biometric Information</u>	No	N/A	N/A	N/A	N/A
<u>Category F: Internet/Network Activity</u>					
• Browsing/search history • Interaction with site/advertisement	No	N/A	N/A	N/A	N/A
<u>Category G: Geolocation data</u>	No	N/A	N/A	N/A	N/A
<u>Category H:</u>					
• Audio	No	N/A	N/A	N/A	N/A
• Electronic	No	N/A	N/A	N/A	N/A
• Visual	No	N/A	N/A	N/A	N/A
• Thermal	No	N/A	N/A	N/A	N/A
• Olfactory	No	N/A	N/A	N/A	N/A
• Other Similar	No	N/A	N/A	N/A	N/A

Category I: Professional/Employment-Related	No	N/A	N/A	N/A	N/A
Category J: Educational Information	No	N/A	N/A	N/A	N/A
Category K: Inferences from Data Collected					
• Preferences	No	N/A	N/A	N/A	N/A
• Characteristics	No	N/A	N/A	N/A	N/A
• Psychological Trends	No	N/A	N/A	N/A	N/A
• Predispositions	No	N/A	N/A	N/A	N/A
• Behavior	No	N/A	N/A	N/A	N/A
• Attitudes	No	N/A	N/A	N/A	N/A
• Intelligence/Abilities/Aptitudes	No	N/A	N/A	N/A	N/A

Other Potential Third Party Disclosures: Personal Information may also be disclosed to third parties to serve our legitimate business interests as follows: (1) as required by law, such as to comply with a subpoena, or similar legal process, (2) as part of a merger, acquisition, bankruptcy or other transaction in which a third party assumes control of all or part of the business, (3) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies as required by law; (4) enforce our agreements with you, and/or (5) investigate and defend ourselves against any third-party claims or allegations.

2. Sale of Personal Information

Regology does not sell and will not sell your Personal Information.

3. **Your Consumer Rights under CCPA.**

California Consumers may contact Regology through their account, by email at privacy@regology.com.

A. **Request Regology Disclose At No Charge:**

- Specific pieces of personal information it has collected about you;
- categories of Personal Information collected, used, and/or disclosed about you;
- categories of sources from which Personal Information is collected
- business and/or commercial purposes for collecting and disclosing your Personal Information;
- categories of third parties with whom your Personal Information has been disclosed/shared;

Right to Know Requests can be submitted to Regology by email at privacy@regology.com.

B. **Request Regology to Delete At No Charge:**

Except as exempted pursuant to CCPA 1798.105, to request Regology delete Personal Information.

Deletion Requests can be submitted to Regology be email at privacy@regology.com or by mail to Regology, Attention Request to Delete: Regology Inc., 437 California Ave, Palo Alto, CA 94306

C. **Verified Request Process**

Regology will verify all consumer requests prior to taking any action in response to such requests. For consumers that maintain an account with Regology, it may verify the identity of the consumer making the request by either matching with the account information on file or through existing account authentication credentials. For non-account holders, Regology shall verify to a reasonably high degree of certainty, including matching at least three pieces of consumer personal information with that maintained by Regology and/or if necessary, by a signed statement by consumer under penalty of perjury that the requestor is the consumer for which personal information is sought.

Under the CCPA, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. Authorized agents must demonstrate they have written authorization from you to make requests on your behalf. Regology may additionally require the consumer to confirm their identity and verify the authorized agent's permission before complying with any request.

D. **Consumer Request Limitations**

Please note that these rights are not absolute and in certain cases are subject to conditions or limitations as specified in the CCPA, including, but not limited to:

- Regology is obligated to disclose/delete only upon a verifiable Consumer request from the consumer or an authorized agent acting on behalf of Consumer.
- Consumers may only make a personal information request twice in a 12-month period.
- Deletion is not required because if retention is necessary to maintain the Personal Information to fulfill the purposes enumerated in CCPA Section 1798.105

Regology will confirm and respond to all requests within the timeframe required under the CCPA. In responding to any request to disclose/delete, Regology shall maintain a record of the requests as required under the CCPA.

4. **Non-Discrimination Policy**

You have the right not to receive discriminatory treatment for exercising any rights conferred by the CCPA. Regology shall not discriminate against a consumer for exercising any rights under the CCPA, including, but not limited to, (a) denying goods or services, (b) charging different prices or rates (including discounts/penalties) that is not directly related to the value provided to Regology for the Personal Information, or (c) suggesting Consumer will receive a different rate/price or different level of quality of goods/services

5. **Your California Privacy Rights under California Civil Code Section 1798.83 & Business and Professions Code Section 22581**

California law permits Consumers to request and obtain from once a year, free of charge, certain information about their Personally Identifiable Information (“PII”) (as defined by California law) disclosed to third parties for direct marketing purposes in the preceding calendar year (if any). If applicable, this information would include a list of the categories of PII that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year.

In addition, a business subject to California Business and Professions Code Section 22581 must allow California residents under age 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted. Your request should include a detailed description of the specific content or information to be removed. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

6. **Accessibility of this CCPA Policy.**

You can download and print a copy of this Notice here: [PDE](#)

7. **Contact Us**

Additional detail regarding our collection, use and disclosure of Personal Information, as well as general opt-out rights and other privacy disclosures, is set forth in our general [Privacy Policy](#).

If you have any questions regarding your Personal Information or about our privacy practices, please contact us at: **Regology, Inc., Attention: Privacy Department**, 437 California Ave, Palo Alto, CA 94306 or by email at privacy@regology.com