

## **PRIVACY NOTICE FOR CALIFORNIA RESIDENTS UNDER THE CALIFORNIA CONSUMER PRIVACY ACT**

Last Updated: September 16, 2020

This privacy notice ("**Privacy Notice**") for California Residents under the California Consumer Privacy Act of 2018 ("**CCPA**") governs the manner in which we process information collected from our Clients, Visitors and Partners who reside in the State of California ("**Consumers**" as defined under the CCPA, and which will be referred to herein as "**you**").

Any terms defined in the CCPA have the same meaning when used in this Privacy Notice. Furthermore, this Privacy Notice is an integral part of our Privacy Policy and thus, definitions used herein but not defined herein shall have the meaning ascribed to them in our Privacy Policy. **[Note: The words "privacy policy" should have an imbedded link to the privacy policy on the website.]**

To learn more about your California privacy rights, please visit <https://oag.ca.gov/privacy/privacy-laws>.

### **CATEGORIES OF PERSONAL INFORMATION WE COLLECT**

Under the CCPA, "**Personal Information**" is defined as any information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household or device.

Please note that, under the CCPA Personal Information does not include: publicly available information from government records and de-identified or aggregated consumer information, information excluded from the CCPA's scope (e.g., health or medical information covered by applicable laws such as the Health Insurance Portability and Accountability Act of 1996 (HIPAA)) and information covered by certain sector-specific privacy laws (e.g., the California Financial Information Privacy Act (FIPA)).

***Please see below a table detailing the categories of Personal Information that we collect (and have collected within the last 12 months):***

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	A name, signature, Social Security number, physical characteristics or description, address, telephone	Yes

California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>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.</p> <p>Some personal information included in this category may overlap with other categories.</p>	
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	No
D. Commercial information.	Records of 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 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.	No
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	No

	information.	
I. Professional or employment-related information.	Current or past job history or performance evaluations.	No
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

### **SHARING INFORMATION**

We may disclose your Personal Information to a third party for a business purpose. When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

We share your Personal Information with the following categories of third parties:

- (i) Service providers.
- (ii) Business Partners.

### **DISCLOSURES OF PERSONAL INFORMATION FOR A BUSINESS PURPOSE**

In the preceding twelve (12) months, the Company has disclosed the following categories of Personal Information for a business purpose:

Category A: Identifiers.

Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).

Category F: Internet or other similar network activity.

### **HOW WE COLLECT YOUR INFORMATION**

We collect the above data from you, in the following ways:

- (i) directly from you, for example, if you contact us;
- (ii) indirectly from you, for example, from observing your actions on our website;
- (iii) from third-party business partners such as analytic providers.

### **USE OF PERSONAL INFORMATION**

We will not share your Personal Information outside of our business purposes as specifically mentioned herein:

- To fulfill or meet the reason you provided the information. For example, if you contact us with an inquiry and share your name and contact information, we will use that Personal Information to respond to your inquiry.
- To provide, support, personalize, and develop our Website and Services, as well as improve our Services.
- For security and fraud detection purposes, and to maintain the safety, security, and integrity of our Services.
- For testing, research, analysis, and product development, including to develop and improve our Services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.
- 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.

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.

### **SALE OF PERSONAL INFORMATION**

In the preceding twelve (12) months, the Company has not sold Personal Information.

## **USERS' RIGHTS & CONTROLS**

The CCPA provides consumers with specific rights regarding their Personal Information. Please review our Privacy Policy **[Note: please insert an imbedded link to the privacy policy where the words "Privacy Policy" are.]** regarding other rights you may have under applicable law.

We provide you with the ability to exercise certain choices and controls in connection with our treatment of your Personal Information, depending on your relationship with us. You may exercise any or all of your rights in relation to your Personal Information by filling out the Privacy Rights Request Form ("PRRF") available here: **[Insert link to the pdf downloadable form that we sent you.]** and send it to our privacy team at: **dpo@internationalrenewals.com**.

## **AMMENDMENTS**

As required under the CCPA, we will update this Privacy Notice every 12 months. The last revision date will be reflected in the "Last Updated" heading located at the top of the Privacy Notice.

## **CONTACT US**

If you have any questions or concerns regarding privacy issues, or if you wish to be provided with any other information related to our privacy practices, please contact us at:

**The International Renewals Group**  
44 Court St. Suite 1217 PMB 94689  
Brooklyn, NY 11201

You can also contact us via email at: [info@internationalrenewals.com](mailto:info@internationalrenewals.com)