

USADATA, Inc. and its subsidiaries (“Company,” “us,” or “we”) values your trust and is committed to the responsible management, use, and protection of personal information. This **California Privacy Policy (“Policy”)** supplements and amends the information contained in our Privacy Policy and Terms of Use and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this Policy, which describes our policies and practices regarding the collection, use, and disclosure of personal information, including personal information you submit or we obtain when you access the Company website or websites, apps, or other online media under our operation and control (collectively, the “Site”), to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this Policy. Nothing herein may be construed as creating any obligations for us beyond what is required by the law. Please read this Policy carefully.

Overview

This overview will provide a plain-spoken statement of USADATA’s approach to and obligations under CCPA. Unless we indicate otherwise, the terms used in this Policy have the meanings set forth in the CCPA.

USADATA is not in the business of creating or maintaining permanent databases of consumer personal information. Instead, USADATA, in connection with providing mailing list, telemarketing list, email list, and data hygiene and enhancement services to a client, collects consumer personal information directly from that client, or from a limited set of reputable third-party data sources, and uses that information to service the client. USADATA does not retain, use, or disclose personal information collected to provide services to one client to provide services to other clients, or for its own commercial purposes, though it may use such information to build or improve the quality of its services and/or to detect data security incidents, or protect against fraudulent or illegal activity. With limited exceptions, USADATA securely destroys all personal information collected at the conclusion of each client project. The categories of personal information USADATA collects, and the purposes for which it uses that information, are described in detail below.

USADATA is not a “business,” as that term is defined in the CCPA. Instead, it is a “service provider” to certain of its clients. Because it is a service provider, USADATA cannot act upon consumer requests to “know” or “delete” their personal information. In the event that we receive such requests, we will advise the requestor of this fact. USADATA does not, on behalf of any business, sell the personal information of any consumer whom USADATA knows has opted-out of the sale of their personal information by that business.

Information We Collect

We may collect personal information in a variety of categories to carry out our business, operate the Site, comply with the law, and other purposes described in the CCPA. Specifically, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES ¹
	Social Security number, driver’s license number, passport number, or other similar identifiers.	NO
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Signature, Social Security number, physical characteristics or description, passport number, driver’s license or state identification card number, insurance policy number, employment, employment history, bank account number, credit card number, debit card number, or any other personal financial information, medical information, or health insurance information.	NO

Category	Examples	Collected
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, sex (including gender, gender identity, and veteran or military status).	YES ¹
	Medical condition, physical or mental disability, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, and 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.	YES ¹
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.	NO
G. Geolocation data.	Physical location or movements.	YES ¹
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 ²
J. Education information.	Education level	YES ¹
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES ¹

¹ These categories of data are collected in the Company's role as a Service Provider to its business clients.

² This category of data is collected by the Company's Human Resources department related to hiring and personnel decisions.

The Company may add to the categories of PI it collects. We will notify you in the event we do so. Personal information does not include certain types of information, including without limitation:

- Information made lawfully available from federal, state, or local government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as:
 - certain health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) or the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - 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 obtain the categories of personal information listed above from the following categories of sources:

- From the clients to whom we provide services.
- From the third-parties that we interact with in connection with the services we perform, including for example from advertising networks, data brokers, service providers, consumer data resellers, data analytics providers, internet service providers, social networks and operating systems and platforms.
- Through activity on our website (www.usadata.com).

Purposes for Which We Use Personal Information

We may use the personal information we collect for one or more of the following business and/or commercial purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To provide you with information, products or services that you request from us.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- 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.

We will not use your personal information for a materially different purpose than those identified above without notifying you of this new use and obtaining your explicit consent.

Categories of Personal Information Sold or Disclosed for Business Purposes

In the past twelve (12) months, we have sold or disclosed for a business purpose the following categories of personal information to the following categories of third parties:

CATEGORIES OF PERSONAL INFORMATION SOLD OR DISCLOSED FOR BUSINESS PURPOSES	CATEGORIES OF THIRD PARTIES TO WHOM SOLD OR DISCLOSED
<p>Identifiers. Examples include real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, and account name.</p>	<p>Sold to clients to whom we provide certain of our services. Clients may include resellers such as printers and agencies or end clients in a variety of industries such as financial services or retail. Disclosed to third-parties we interact with in connection with the services we perform, such as data brokers that provide mailing lists, data enhancement services and/or email, digital or social media campaign services.</p>
<p>Protected classification characteristics under California or federal law</p>	<p>Sold to clients to whom we provide certain of our services. Clients may include resellers such as printers and agencies or end clients in a variety of industries such as financial services or retail. Disclosed to third-parties we interact with in connection with the services we perform, such as data brokers that provide mailing lists, data enhancement services and/or email, digital or social media campaign services.</p>
<p>Commercial information</p>	<p>Sold to clients to whom we provide certain of our services. Clients may include resellers such as printers and agencies or end clients in a variety of industries such as financial services or retail. Disclosed to third-parties we interact with in connection with the services we perform, such as data brokers that provide mailing lists, data enhancement services and/or email, digital or social media campaign services.</p>

CATEGORIES OF PERSONAL INFORMATION SOLD OR DISCLOSED FOR BUSINESS PURPOSES	CATEGORIES OF THIRD PARTIES TO WHOM SOLD OR DISCLOSED
Geolocation data	Sold to clients to whom we provide certain of our services. Clients may include resellers such as printers and agencies or end clients in a variety of industries such as financial services or retail. Disclosed to third-parties we interact with in connection with the services we perform, such as data brokers that provide mailing lists, data enhancement services and/or email, digital or social media campaign services.
Professional or employment-related information	Disclosed to third-parties that provide human resources support services.
Education information	Sold to clients to whom we provide certain of our services. Clients may include resellers such as printers and agencies or end clients in a variety of industries such as financial services or retail. Disclosed to third-parties we interact with in connection with the services we perform, such as data brokers that provide mailing lists, data enhancement services and/or email, digital or social media campaign services.
Inferences drawn from other personal information.	Sold to clients to whom we provide certain of our services. Clients may include resellers such as printers and agencies or end clients in a variety of industries such as financial services or retail. Disclosed to third-parties we interact with in connection with the services we perform, such as data brokers that provide mailing lists, data enhancement services and/or email, digital or social media campaign services.

(NOTE: Under the CCPA, personal information is not considered “sold” if it is shared at the direction of the consumer.)

Right to Know

You as a California resident have the right to request that businesses disclose certain information to you about their collection, use, disclosure, and/or sale of your personal information over the past 12 months. Specifically, you have the right to request that these businesses disclose to you:

- The categories of personal information that were collected about you.
- The categories of sources for the personal information were collected about you.
- The business or commercial purpose for collecting that personal information.
- The categories of personal information the business sold or disclosed for a business purpose.
- The categories of third parties to whom the personal information was sold or disclosed for a business purpose.
- The specific pieces of personal information these businesses collected about you.

The business is required to verify your identity before complying with your request. Instructions for submitting verifiable requests for the above information, an explanation of how those requests are verified, and a description of circumstances which may result in the denial of your request, should be set forth in the business' privacy policy.

Deletion Request Rights

You have the right to request that a business delete your personal information from its records. A business is required to verify your identity before complying with your request. Instructions for submitting verifiable requests, an explanation of how the business verifies requests, and a description of circumstances which may result in the denial of your request, should be set forth in the business's privacy policy.

Submitting Consumer Rights Requests

Because it is a service provider, USADATA cannot act upon consumer requests to know or delete their personal information. In the event that we receive such requests, we will advise the requestor of this fact. USADATA does not, on behalf of any business, sell the personal information of any consumer whom USADATA knows has opted-out of the sale of their personal information by that business.

Response Time and Format

We will confirm receipt of your Request within 10 business days, and will endeavor to respond to your Request within forty-five (45) calendar days (though, in some instances, we may require up to ninety calendar (90) days to respond, in which case we will notify you that we need the applicable extension, and explain the basis for it). As a service provider, we cannot respond to requests to know or delete your personal information, and will notify you of that fact upon receipt of your request. In the event that a business, on whose behalf we sell your personal information, advises us that you have opted-out of such sales, we will cease selling your information on behalf of that business.

In the event we cannot comply with your request, in part or in full, we will provide a corresponding explanation.

We do not charge a fee to process or respond to your verifiable consumer request 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.

Opt-Out Rights

You have the right to opt-out of the sale of your personal information by a business that has collected it. Instructions for submitting verifiable requests, an explanation of how the business verifies requests, and a description of circumstances which may result in the denial of your request, should be set forth in the business's privacy policy.

Minors

Minors may not use our websites or submit information to us. We do not intentionally collect information about minors.

Additionally, USADATA does not have actual knowledge that it has sold the personal information of minors under 16 years of age.

Non-Discrimination

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

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

Changes to Our Privacy Notice

We reserve the right to amend this Policy at our discretion and at any time. When we make changes to this Policy, we will post the updated Policy on our Site and update the Policy's effective date. Such changes will take effect immediately upon posting to the Site and will apply to your use of the Site and the Company's practices concerning personal information after the new effective date reflected in the Policy. Your continued use of our Site following the posting of changes constitutes your acceptance of such changes.

Other California Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) provides California residents with the right to request information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make a request, please contact us at the following email address: privacy@usadata.com.

Contact Information

If you have any questions or comments about this Policy, or about our privacy policies and practices in general, please do not hesitate to contact us at:

Website: www.usadata.com

Request for Information: privacy@usadata.com

Phone Number: (800) 395-7707

Physical Address:

USADATA, Inc.

Attn: Privacy & Compliance

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