

## California Consumer Privacy Act Notice

Version 2023.2. January 11, 2023.

The California Consumer Privacy Act of 2018 as amended and modified by the California Privacy Rights Act of 2020 (collectively, the “CCPA”) gives California residents enhanced access to and control over their privacy by establishing the following rights regarding Personal Information collected by businesses. Any capitalized terms used in this Notice shall have the meaning [assigned to them in the CCPA](#).

A. If you are a California resident, you have the following rights under the CCPA:

**1. Right to Know/Disclosure Right.** You have the right to request a disclosure of the Personal Information collected, sold, and shared about you over the past 12 months and the purpose for doing so. Upon submission of a verifiable consumer request, we will provide you with the following information. *Please be aware that the disclosure results will not include credit report information, certain health information, financial information or driving records.*

- The categories of Personal Information we have collected about you;
- The categories of sources from which we collect Personal Information;
- The specific pieces of Personal Information we have collected about you;
- Our business or commercial purpose for collecting, selling or sharing Personal Information;
- The categories of Personal Information about you that we sold or shared;
- The categories of third parties to whom we sold or shared the Personal Information about you; and
- The categories of Personal Information that we disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

**2. Right to Deletion.** If we collected Personal Information from you, you have the right to request the deletion of this Personal Information.

**3. Right to Opt-Out of the Sale or Sharing of Personal Information.** You have the right, at any time, to direct a business not to sell your Personal Information.

**4. Right to Limit Use and Disclosure of Sensitive Personal Information.** You have the right to limit a business’s use of your sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.

**5. Right to Be Free from Discrimination.** You have the right to be free from discrimination and/or retaliation for exercising any of the California

consumer privacy rights. If you choose to exercise any of your CCPA rights, we will not:

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

**6. Right to Opt-In to the Sale of Personal Information for Children.** A California resident minor (between ages 13 and 16) or child's parent or guardian (if the child is under the age of 13) has the right to opt-in to allowing us to sell that minor's or child's personal information.

**B.** For more information about the CCPA, please access the full text of the law at [California Consumer Privacy Act of 2018](#).

**C. Personal Information STRETTO Collects from California Residents.** In the past 12 months, we have collected the following Personal Information about California residents:

- 1. Identifiers.** Examples include 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.
- 2. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).** Examples include 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.
- 3. Commercial information.** Examples include records of personal property, products or services purchased, obtained or considered or other purchasing or consuming histories or tendencies.
- 4. Internet or other electronic network activity.** Examples include browsing history, search history and information on a Consumer's interaction with a website, application, or advertisement.
- 5. Professional or employment-related information.** Examples for California residents who are STRETTO employees include current or past job history or performance evaluations; and log in credentials for company-owned applications. Examples for California residents not employed by STRETTO include verification of current employment for account opening.

**6. Biometric information.** Examples include call recordings; genetic, physiological, behavioral, and biological characteristics; or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

**7. Sensitive personal information.**

**D. Personal Information STRETTO does Not Collect from California Residents.** In the past 12 months, we have not collected the following Personal Information about California residents:

**1. Protected classification characteristics under California or federal law<sup>1</sup>.** Examples include 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).

**2. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))<sup>2</sup>.** Examples include 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.

**3. Geolocation data.** Examples include physical location or movements.

**4. Sensory data.** Examples include audio, electronic, visual, thermal olfactory or similar information.

**5. Inferences drawn from other Personal Information** to create a profile about you reflecting your preferences, characteristics, behavior, attitudes and aptitudes, intelligence and abilities.

**E. Sources STRETTO Uses to Collect Personal Information.** We collect Personal Information from California residents using the following categories of Sources:

**1. California residents themselves** when they visit our Sites, use our Software and/or order our Services;

**2. Consumer Reporting Agencies,** such as Experian, TransUnion and Equifax;

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<sup>1</sup> Except to the extent that such information was provided to Stretto in connection with an application for employment with Stretto and/or actual employment with Stretto.

<sup>2</sup> Except to the extent that such information was provided to Stretto in connection with an application for employment with Stretto and/or actual employment with Stretto.

3. Online and Mobile Websites & Applications, through Cookies and web site analytics Service Providers such as Google Analytics;
4. Other Authorized Data Compilers;
5. Public Records, such as judgments and foreclosures;
6. Publishing Product Companies, such as LexisNexis;
7. Government Entities, such as the Internal Revenue Service;
8. Attorneys Representing California Residents in bankruptcy cases; and
9. Trustees assigned to the bankruptcy cases filed by California Residents.

**F. Why STRETTO Collects, Uses, and Shares Personal Information.** We collect, use, and disclose the Personal Information described in *Section 12. C.* for one or more of the following commercial and business purposes:

1. **STRETTO's Commercial Purposes.** Our Commercial Purposes as identified in the CCPA include marketing, developing insights as to consumer interests and behaviors, keeping contact information up to date and relevant and enabling relevant and personalized marketing messages.
2. **STRETTO's Business Purposes.** Our Business Purposes as identified in the CCPA include internal research, product development, auditing, quality control, improving our services, legal compliance, order fulfillment, identity verification, maintaining and servicing accounts, providing customer service, and detecting security incidents and protecting against fraudulent or illegal activity.
3. **Affiliated Companies' Business and Commercial purposes,** including marketing, internal research, product development, order fulfillment, quality control and providing customer service.
4. **Joint marketing by STRETTO and other financial companies.**
5. **Nonaffiliated Companies' Business and Commercial Purposes,** including marketing, internal research and product development.

**G. Recipients of Personal Information.** STRETTO discloses and/or sells Personal Information to the following categories of recipients for the purposes set out in *Section 12. F.:* service providers, Affiliated Companies, public or government entities, advertising networks, Internet service providers, data analytics providers, operating systems and platforms, consumer reporting agencies, Nonaffiliated Companies, and companies with which STRETTO has a joint marketing agreement.

**H. Retention of Personal Information.** STRETTO retains collected Personal Information, including sensitive personal information, only as long as reasonably necessary for the effectuation of each disclosed purpose for which the information was collected.

**I. Making a CCPA Request.** To make a request under the CCPA, please contact us using one of the methods described below. In order to verify your identity and process your request, we will require you to provide us with your first name, last name, social security number, and current address. Only you or someone legally authorized to act on your behalf may make a request related to your personal information. To designate an authorized agent to act on your behalf, please submit your request by U.S. Mail and include a signed authorization permitting a named person to request information as your agent.

**1. Request by U. S. Mail, Email or Fax:** Please fill out the [CCPA Request Form](#) completely. Sign and date the form. ***Submit the form and a legible copy of a state-issued photo ID showing your current name and address***

- BY FAX to 1.866.307.1003, *or*
- BY EMAIL to [Legal@stretto.com](mailto:Legal@stretto.com), *or*
- BY MAIL to STRETTO, ATTN: CCPA Request, 410 Exchange Ste, 100, Irvine, CA 92602.

**2. Request by Telephone:** Please call 1.866.218.1003 between the hours of 8:00 a.m. and 8:00 p.m. ET, Monday – Friday.

**J. Contact Information.** For questions or concerns about Stretto's California Privacy Rights policy or practices, please call us toll free at **1.866.218.1003** between the hours of 8:00 a.m. and 8:00 p.m. ET, Monday – Friday; or email us at [Legal@stretto.com](mailto:Legal@stretto.com) .