

Effective Date: May 2024

This Privacy Notice for California Residents ("Privacy Notice") supplements the information contained in our [Privacy Policy](#). It provides eligible California residents with specific rights concerning our collection, retention, and use of Personal Information. Any terms not defined in this section have the same meaning as defined in the CCPA.

A. Information we collect:

In our business, we collect information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("Personal Information"). Depending on how you have interacted with us, we may have collected the following categories of Personal Information from you in the last twelve (12) months, which we may also share with third parties for the purposes outlined in this Privacy Notice. The categories below are those identified in the California Consumer Privacy Act (CCPA).

Please note that we have yet to collect every type of Personal Information identified in the examples below, and the types of Personal Information we have collected on any consumer depends on how the consumer has interacted with us.

Category	Examples	Collected?
Identifiers.	This category may include: name, postal address, unique personal identifiers, online identifiers, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers. Under the CCPA, "unique identifiers" or "unique personal identifier" means a persistent identifier that can be used to recognize a consumer, a family, or a device that is linked to a consumer or family over time and across different services, including, but not limited to, a device identifier; an Internet Protocol address; cookies, beacons, pixel tags, mobile ad identifiers, or similar technology; customer number, unique pseudonym, or user alias; telephone numbers, or other forms of persistent or probabilistic identifiers that can be used to identify a particular consumer or device.	YES
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) and protected classification characteristics under	This category may include: name, signature, Social Security number, physical characteristics, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education or employment information, financial account numbers, medical information, health insurance information, age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex and gender information, veteran or military status, or genetic information.	YES (for prospective employees)



California or federal law.		
Commercial information.	This category may include: records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
Biometric information.	This category may include: imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a face print, a minutiae template, or a voiceprint, can be extracted.	NO
Internet or other electronic network activity information.	This category may include: browsing history, search history, and information regarding interactions with an Internet Web site, application, or advertisement.	NO
Geolocation data.	This category may include your device's physical location or movements or if you share the information with us at an event.	YES
Sensory data.	This category may include: audio, electronic, visual, thermal, olfactory, or similar information.	NO
Professional or employment-related information.	This category may include: current or past job history or performance evaluations.	YES
Non-public education information	This category may include: education records directly related to a student maintained by an educational institution or party acting on its behalf (e.g., grades, transcripts, schedules, and student ID numbers).	YES (prospective employees)
K. Inferences are drawn from other personal information.	This category may include: inferences drawn from the above information that may reflect your preferences, characteristics, predispositions, behavior, interests, attitudes, or similar behavioral information.	YES

Please note that some categories of personal information described in the CCPA overlap; for instance, your name is an Identifier, and data type is defined in Cal. Civil Code 1798.80(e).

Personal information does not include publicly available information from government records or any deidentified or aggregated consumer information. In addition, the CCPA excludes the following from its scope: health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and personal information covered by specific 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 do not knowingly collect, solicit, or sell personal information from anyone under the age of 16

B. Use and Sharing of Personal Information:

We may use or disclose the personal information we collect for the purposes described in the "Information Use" and "Information Sharing" sections of our Online Privacy Policy.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a

business purpose: identifiers; California Customer Records personal information categories; protected classification characteristics under California or federal law; geolocation data; professional or employment-related information (for prospective employees only); non-public education information (for prospective employees only); and inferences drawn from other personal information.

C. Sales of Personal Information:

We have not sold personal information in the preceding twelve (12) months.

D. Your Rights & Choices:

The CCPA provides eligible California residents with specific rights concerning our collection, retention, and use of Personal Information.

(a) Right to Know About Personal Information Collected, Disclosed, or Sold

You have the right to request that we provide certain information about our collection and use of your Personal Information over the past twelve (12) months. Specifically, you have the right to request disclosure of the categories of Personal Information and specific pieces of Personal Information we have collected about you over the last 12 months. Upon the submission of a verifiable consumer request (see Exercising your California Privacy Rights, below), we will disclose to you:

- the categories of Personal Information we collected about you;
- the categories of sources from which Personal Information was collected;
- the business or commercial purpose for collecting Personal Information;
- the business or commercial purpose for disclosing or selling Personal Information; and
- the categories of third parties with whom we sold or disclosed Personal Information for a business purpose.

We will also provide the specific pieces of Personal Information we collected about you, subject to certain exceptions under applicable law, if you also request access to such information.

We do not provide these access and data portability rights for B2B personal information.

(b) Right to Request Deletion of Personal Information

You also have the right to request that we delete personal information we have collected and maintained about you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will conduct a reasonable search of our records to locate any Personal Information we have collected about you that is eligible for deletion and delete such Personal

Information. To the extent we have shared any Personal Information collected about you with service providers eligible for deletion, we will also direct those service providers to delete that Personal Information. For clarity, however, we may only be able to partially comply with your request to delete all of your personal information as set forth under the CCPA. Specifically, we are not required to delete any Personal Information we have collected about you that is necessary for us and our service provider(s) to:

- Complete the transaction for which the Personal Information was collected, fulfill the terms of a written warranty or product recall conducted following federal law, and provide a good or service requested by you or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible.
- Debug to identify and repair errors that impair existing intended functionality.



- Exercise free speech, ensure the right of another consumer to exercise their free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act according to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- Enable solely internal uses that align with your expectations based on your relationship with us.
- Comply with a legal obligation, such as retaining records for some time as set out in local, state, or federal laws.
- Otherwise, use your personal information internally, legally compatible with the context in which you provided your information.

Following a deletion request, any Personal Information about you not deleted from our systems due to the above exceptions will only be used for the purposes provided by the applicable exceptions. Thus, all Personal Information about you that is not subject to a deletion exception will either be (1) permanently deleted on our existing systems (except for archived or backup systems maintained for emergency disaster recovery and business continuity purposes); (2) deidentified; or (3) aggregated so as not to be personal to you.

We do not provide these access and data portability rights for B2B personal information.

(d) Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you for exercising any of your privacy rights. Unless permitted by applicable law, we will not.

- Deny you goods or services.
- We charge you different prices or rates for goods or services by granting discounts or other benefits or imposing penalties.
- Provide you with a different level or quality of goods or services.
- Suggest receiving a different price or rate for goods or services or a different level or quality.

(e) Exercising Your California Privacy Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Emailing us at compliance@sbecipher.com

Requests to exercise your rights under the CCPA require verification of your identity and may be made only by you, your parent or guardian (if you are under 18 years of age), a person to whom you have given power of attorney according to California Probate Code sections 4000 to 4465, or an authorized agent that is registered with the California Secretary of State. Suppose a parent or guardian submits a request on behalf of a minor. In that case, they must submit proof that they are the parent or guardian of the subject consumer and must verify the consumer's identity (e.g., provide a notarized letter). If someone with power of attorney requests on behalf of a consumer, they must verify the individual consumer's identity and submit documentation establishing the power of attorney. If an authorized agent is submitting a request on behalf of a consumer, they must verify the individual consumer's identity, provide written permission from the consumer to submit the request on the consumer's behalf and submit documentation establishing registration with the Secretary of State. If we cannot verify that the consumer authorizes the requestor to act on such consumer's behalf, we are not obligated to provide information or respond to the request.

If you have any questions about requesting on behalf of another consumer, please email us at compliance@sbecipher.com.



Your verifiable consumer request must provide sufficient information that allows us to reasonably verify that you are the person about whom we collected Personal Information or that you are an authorized representative of such person. We will not respond to your request or provide personal information if we cannot verify your identity or authority to make the request and confirm that the personal information relates to you. While we may ask for Personal Information to verify the requestor or consumer's identity when making a request, we will only use that Personal Information provided in a verifiable consumer request to confirm the requestor's identity or authority to make the request. Making a verifiable consumer request does not require creating an account with us. Additionally, you may only make a verifiable consumer request for access twice within 12 months.

(f) Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) calendar days of receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Within ten (10) business days of receiving the request, we will confirm receipt and provide information about our verification and processing of the request. We will maintain records of consumers.

Requests were made according to the CCPA, and our response to said requests was for at least twenty-four (24) months.

Our disclosures will only cover the 12 months before receiving the verifiable consumer request. If you have an account with us, we may require you to deliver our written response through that account. If you do not have an account with us, we will provide our written response electronically, though you may alternatively choose to receive delivery by mail. If applicable, the response will also explain why we cannot comply with a request. Requests for the specific pieces of information that we have collected about you will be sent in a portable, readily usable format that you may transmit to another entity without hindrance.

We only charge a fee to process or respond to your verifiable consumer request if 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 a cost estimate before completing your request.

(g) Your Rights Under "Shine the Light"

In addition to your rights under the CCPA, California Civil Code Section 1798.83 permits California residents to request information regarding our disclosure, if any, of their Personal Information to third parties for their direct marketing purposes. To make such a request, please email or write to us using the information provided in the "Contact Us" section above.

Non-affiliated third parties are independent of us, and if you wish to receive information about your disclosure choices or stop communications from such third parties, you will need to contact those non-affiliated third parties directly.