

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Last Updated Date: January 1, 2020

Effective Date: January 1, 2020

This Privacy Notice for California Residents supplements the information contained in our [Privacy Policy](#) and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). Any terms we use in the Privacy Policy without defining them have the same definition given to them in the Privacy Policy.

We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this notice.

INFORMATION WE COLLECT

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”).

Personal information does not include (i) publicly available information from government records, (ii) anonymized or aggregated consumer information, or (iii) information excluded from the CCPA’s scope, such as health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 and the California Confidentiality of Medical Information Act or information covered by certain sector-specific privacy laws including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the California Financial Information Privacy Act, and the Driver’s Privacy Protection Act of 1994.

In particular, we have collected the following categories of personal information from our 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, account name, social security number, driver's license number, passport number, or other similar identifiers.	Yes
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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.	Yes
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, colour, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex	No

	(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).	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
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 information.	No
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 draw from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behaviour, attitudes, intelligence, abilities, and aptitudes.	No

As further detailed in our Privacy Policy, we obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example information that you provide by filling in forms, records and copies of your correspondence if you contact us, details of transactions and your subscriptions to the Services.
- Indirectly from you. For example, observing your actions on the Sites or your use of our Services, or through the use of cookies or other technologies to automatically collect information from you.
- Third party business partners. For example Google Analytics, Google AdWords, Google DoubleClick, and Hotjar.

USE OF PERSONAL INFORMATION

As further detailed in our Privacy Policy, we may use or disclose the personal information we collect for one or more of the following business purposes:

- Provide the Service(s) you request;
- Bill and collect for the Service(s) provided to you;

- Send you marketing communications;
- Provide customer care;
- Protect our rights or property;
- Enforce the Terms of Service;
- Comply with legal requirements;
- Improve our Sites and Services;
- Respond to your inquiries, questions and/or other requests;
- Respond to court orders, subpoenas or other legal proceedings; and
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

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.

SHARING PERSONAL INFORMATION

We may share 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 the personal information confidential and not use it for any purpose except performing the contract.

We share personal information with the following categories of third parties:

- Service providers;
- Advertisers;
- Internet cookie data recipients (for example Google Analytics); and
- Parent or subsidiary organizations

DISCLOSURES OF PERSONAL INFORMATION FOR A BUSINESS PURPOSE

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

- A. Identifiers;
- B. California customer records personal information categories;
- D. Commercial information; and
- F. Internet or other similar network activity;

SALES OF PERSONAL INFORMATION

In the preceding twelve (12) months, we have not sold personal information.

YOUR RIGHTS AND CHOICES

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY RIGHTS

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting or selling that personal information;

- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about you (also called a data portability request); and
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing: (a) sales, identifying the personal information categories that each category of recipient purchased, and (b) disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

DELETION REQUEST RIGHTS

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

EXERCISING ACCESS, DATA PORTABILITY, AND DELETION RIGHTS

To exercise the access, data portability, and deletion rights described above please submit a verifiable consumer request to us by either calling us or emailing us at support@1screen.com.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a twelve (12) month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

RESPONSE TIMING AND FORMAT

We endeavour to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. We will send you confirmation of receipt of any verifiable consumer request within ten (10) days of its receipt.

We will deliver our written response by mail or electronically at your option.

Any disclosures we provide will only cover the twelve (12) month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another without hindrance.

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 requests warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

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;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods 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.

CHANGES TO OUR PRIVACY NOTICE

This privacy notice may change over time, so please review it frequently. The effective date at the top indicates the last time this privacy notice was modified. If we modify the terms of this Privacy Notice, we will notify you by posting a notice on our website thirty (30) days prior to the effective date of the changes. If we are required by applicable data protection laws, including the CCPA, to give you enhanced notice or seek your consent for any such changes, we will do so. You can see when this notice was last updated by checking the last updated date displayed at the top of this policy. As of the notice's effective date, this privacy notice will supersede all previous privacy notices.

CONTACT INFORMATION

If you have any questions, concerns, or comments about this notice, the way in which we collect and use your information described above and in the Privacy Policy, your choices and rights regarding such use, please do not hesitate to contact us by phone or by email on support@1screen.com.