

Privacy Notice For California Consumers

Last updated: June 2023

This notice contains disclosures required by the California Privacy Rights Act ("CPRA"). Terms defined in the CPRA have the same meaning when used in this notice. This notice is only relevant to California residents ("consumers" or "you"). Consumers with disabilities may access this notice by printing the pdf below which is compatible with character recognition software.

[pdf]

Information We Collect. In the past 12 months, we have collected and shared for a business purpose the following categories of personal information ("Personal Information"):

| Category | Examples | Collected | Shared for Business Purpose |
|--|---|-----------|-----------------------------|
| A. Identifiers | A real name, alias, email address, postal address, Internet Protocol (IP) address, account name, Social Security number, driver's license number, passport number, or other similar personal identifiers. | NO | NO |
| B. Other personal information categories, as listed in the California Customer Records Statute | A signature, physical characteristics or description, telephone 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. | NO | NO |
| C. Protected classification characteristics under California or federal law | Age (40 years or older), race, citizenship, marital status, sex, veteran or military status. | NO | NO |
| D. Commercial information | Account activity, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | NO | NO |
| E. Biometric information | Fingerprints, faceprints, voiceprints, and iris or retina scans. | NO | NO |
| F. Internet or other similar | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. | YES | YES |

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|---|---|----|----|
| network activity | | | |
| G. Geolocation data | Physical location or movements. | NO | NO |
| H. Sensory data | Audio, electronic, visual, thermal, olfactory, or similar information. | NO | NO |
| I. Professional or employment-related information | Current or past job history or performance evaluations. | NO | NO |
| J. Non-public education information (per the Family Educational Rights and Privacy Act) | Education records directly related to a student maintained by an educational institution or party acting on its behalf. | NO | 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 | NO |
| L. Sensitive personal information | A consumer's SS, driver's license, state ID card, or passport number; account log-in or debit/credit card number in combination with any access code, password, or account credentials; precise geolocation; racial/ethnic origin, religious/philosophical beliefs, or union membership; contents of mail, email, and text messages; genetic data; biometric information; PHI; or sex life or sexual orientation. | NO | NO |

Personal Information does not include information that is publicly available, de-identified/ aggregated, or subject to HIPAA or GLBA.

We collect Personal Information as described above.

Purpose for Collection and Use of Personal Information. We may collect or use Personal Information for one or more of the following purposes:

- Providing you with information about our products and services;
- Providing you with performance and other updates;
- One or more of the following business purposes:
 - Performing services (for us or our service provider or contractor) such as account servicing, processing orders and payments, and analytics;
 - Auditing related to our interactions with you;
 - Legal compliance;
 - Detecting and protecting against security incidents, fraud, and illegal activity;
 - Debugging;
 - Internal research for technological improvement;
 - Internal operations;
 - Activities to maintain and improve our services; and
 - Short-term, transient use, such that the personal information is not disclosed to another third party and is not used to build a profile about you.

Sharing Personal Information. We may disclose Personal Information to:

- Service providers, including but not limited to: administrators, lenders, banks, brokers, auditors, law firms, consultants, placement agents, employment agencies, credit bureaus;
- Affiliates;
- Business partners;
- Legal or government regulatory authorities as required by applicable law;
- In connection with a potential business transfer; and
- Third parties to whom you or your agents authorize us to disclose such information in connection with services we provide to you.

In the past 12 months, we have not sold Personal Information to third parties.

Length of Time. We will keep your Personal Information for as long as necessary to comply with our regulatory obligations.

Rights of California Consumers. The CPRA provides a California consumer the following rights, subject to certain exceptions and limitations:

- The right to request: (a) the categories and specific pieces of Personal Information we collect about you; (b) the categories of sources from which we collect your Personal Information; (c) our business or commercial purposes for collecting, selling or sharing your Personal Information; (d) the categories of Personal Information disclosed for a business purpose and the categories of persons to whom it was disclosed; (e) the categories of your Personal Information (if any) that we have either sold, shared, or disclosed.
- For certain categories of Personal Information, the right to request a list of what we disclosed to third parties for their own direct marketing purposes in the past 12 months and the names and addresses of those third parties.
- The right to request that we delete your Personal Information, subject to certain exceptions.
- The right to opt out of our sale(s) (if any) of your Personal Information.

- The right to request we correct any inaccurate Personal Information maintained about you.
- The right to limit our use of your sensitive personal information to only use that is necessary to perform the services expected or provide the goods reasonably expected.
- The right not to receive discriminatory treatment for exercising your CPRA rights.

You may submit requests relating to your exercise of CPRA rights to us via:

phone **973-921-3420**

or

email **compliance@columbushill.com**.

You may only make a verifiable request for access or data portability twice within a 12-month period. All verifiable requests must provide (1) enough information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative and (2) sufficient detail that allows us to properly evaluate and respond to it.

We endeavor to respond to a verifiable request within 45 days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Questions

If you have questions regarding this Notice, please contact us at **compliance@columbushill.com**.