

LAST UPDATED: July 28 2020

CALIFORNIA CONSUMER PRIVACY ACT

Mintz Group, LLC

CCPA PRIVACY POLICY

Pursuant to the California Consumer Privacy Act of 2018 (“**CCPA**”), this Privacy Policy provides California residents who are our clients, prospective clients, or representatives of our clients or prospective clients, with a description of our online and offline practices regarding the collection, use, and disclosure of their Personal Information in our capacity as a data controller (e.g., where we determine the purpose and means of our use of personal information). Under the CCPA, “**Personal Information**” is information that identifies, relates to, describes, or could reasonably be associated or linked with a particular California resident or household. We are providing this Privacy Policy in addition to the information contained in our general [Privacy Policy](#).

Collection of Personal Information

We plan to collect, and have collected within the preceding 12 months, the following categories of Personal Information, as listed in the CCPA:

- A. “**Identifiers.**” Identifiers, such as name and contact information;
- B. “**Customer Records Information.**” Personal information as defined in the California customer records law, such as financial information;
- C. “**Protected Class Information.**” Characteristics of protected classifications under California or federal law, such as sex, age, race, and national origin;
- D. “**Transaction Information.**” Commercial information, such as transaction information and history;
- E. “**Online Use Information.**” Internet or network activity information, such as interactions with our website;
- F. “**Geolocation Data.**” Geolocation data such as device location and approximate location derived from IP address;
- G. “**Audio/Video Data.**” Audio, electronic, visual and similar information, such as photos and audio and video recordings;
- H. “**Employment Information.**” Professional or employment-related information, such as work history and prior employer; and
- I. “**Inferences.**” Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual’s preferences and characteristics.

Where We Obtain Personal Information From

We collect this Personal Information from you and from these other types of sources: social media platforms, publicly available databases, joint marketing partners, press releases issued by companies and organizations, professional and other association membership lists, referrals from clients and other third parties, and lists of attendees at industry conferences and events.

Our Use of Personal Information

We may use this Personal Information to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business purposes and objectives, including, for example, to: develop, improve, repair, and maintain our products and services; personalize, advertise, and market our products and services; conduct research, analytics, and data analysis; maintain and secure our

facilities and infrastructure; undertake quality and safety assurance measures; conduct risk and security control and monitoring; detect and prevent fraud; perform identity verification; perform accounting, audit, and other internal functions, such as internal investigations; comply with law, legal process, and internal policies; maintain records; and exercise and defend legal claims.

Disclosure of Personal Information

We share Personal Information with the following categories of third parties:

- **“Service Providers”** We share with our trusted third-party service providers, to facilitate services they provide to us, such as internet services, personal information databases, website hosting, data analytics, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing, background checks, and other services.
- **“Clients”** We may share with our clients as part of the work we do for them.
- **“Social Networks”** We may share with social network platforms, who use the data we share in accordance with their own privacy policies.
- **“Marketing Partners”** We may share with our marketing partners to permit them to send you marketing communications, consistent with your choices.
- **“Legal Authorities”** We share with public and government authorities, including regulators and law enforcement, to respond to requests, as well as to protect and defend legal rights.
- **“Other Parties in Litigation”** We share information in the context of litigation discovery and in response to subpoenas and court orders.

In the preceding 12 months, we disclosed for our operational business purposes the following categories of Personal Information to the following categories of third parties:

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes
Identifiers	Service Providers, Clients, Social Networks, Marketing Partners, Legal Authorities, Other Parties in Litigation
Customer Records Information	Service Providers, Legal Authorities, Other Parties in Litigation
Protected Class Information	Service Providers, Clients, Social Networks, Legal Authorities, Other Parties in Litigation
Transaction Information	Service Providers, Clients, Social Networks, Legal Authorities, Other Parties in Litigation
Online Use Information	Service Providers, Social Networks, Legal Authorities, Other Parties in Litigation

Geolocation Data	Service Providers, Clients, Social Networks, Legal Authorities, Other Parties in Litigation
Audio/Video Data	Service Providers, Clients, Legal Authorities, Other Parties in Litigation
Employment Information	Service Providers, Clients, Legal Authorities, Other Parties in Litigation
Inferences	Service Providers, Clients, Social Networks, Legal Authorities, Other Parties in Litigation

We do not “sell” and have not “sold” Personal Information as defined by the CCPA in the last 12 months.

Your CCPA Rights

Requests to Know and Delete

If you are a California resident, you may make the following requests:

(1) “Request to Know”

You may request that we disclose to you the following information covering the 12 months preceding your request:

- The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
- The specific pieces of Personal Information we collected about you;
- The business or commercial purpose for collecting Personal Information about you; and
- The categories of Personal Information about you that we otherwise shared or disclosed, and, for each, the categories of third parties with whom we shared or to whom we disclosed such Personal Information (if applicable).

(2) “Request to Delete”

You may request that we delete Personal Information we collected from you.

To make a Request to Know or a Request to Delete, please contact us at www.mintzgroup.com or 855-594-2130. We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. We may need to request additional Personal Information from you, such as a copy of your ID, in order to verify your identity and protect against fraudulent requests. We may send our response to your request to the contact point in our records that is associated with the Personal Information that is requested. If you make a Request to Delete, we may ask you to verify your request before we delete your Personal Information.

If you are the authorized agent of a consumer, making a Request to Know or a Request to Delete on behalf of the consumer, we will ask you for:

1. proof of your registration with the California Secretary of State to conduct business in California.
2. proof that the consumer has authorized you to make a Request to Know or a Request to Delete on the consumer’s behalf. This must be a permission signed by the consumer. “Signed” means

that the permission has either been physically signed or provided electronically in accordance with the Uniform Electronic Transactions Act, Civil Code 1633.7 *et seq.*

If an authorized agent has not provided us with a power of attorney from the consumer pursuant to Probate Code sections 4000-4465, we may also:

1. require the consumer to provide you with a written permission signed by the consumer to make the request on the consumer's behalf
2. verify the identity of the consumer as we would if the consumer were making the request personally.
3. Obtain verification from the consumer that they provided the authorized agent permission to make the request.

Right to Non-Discrimination

You have the right to be free from unlawful discriminatory treatment for exercising your rights under the CCPA.