

Additional Information for Consumers in California

Notice regarding the collection of personal information

Categories of personal information we collect and their sources

The following are the categories of personal information we collect from consumers and the source of collection, in accordance with the categories of personal information enumerated in the California Consumer Privacy Act of 2018 (CCPA). These are also the categories of information we collected in the past 12 months. A more detailed description of the particular pieces of information we collect is provided in the preceding sections of this policy.

Categories of personal information (as per the categories enumerated in the CCPA)	Specific types of personal information collected	Categories of sources of collection
Identifiers	<ol style="list-style-type: none">1. Identifiers such as name and email address, that you choose to provide us when you send us an email, complete an online form or register to use our Products.2. Internet Protocol (IP) address that your device uses to connect to the internet.	<ol style="list-style-type: none">1. Directly from you, the consumer.2. From your device, when you access our Website or our Client websites that use our Technology.
Internet or other electronic network activity information	Browsing history, search history, and information regarding a consumer's interaction with an internet website or advertisement.	Through our Client websites that use our Technology, when you, the consumer, access those websites.
Location	Regional location of user's device	Through the IP address of your device, which is collected through our

		Client websites that use our Technology, when you, the consumer, access those websites
Inferences	Inferences we draw from the above mentioned categories of information to create a profile reflecting the consumer's preferences, characteristics and behavior	Through our Client websites that use our Technology, when you, the consumer, access those websites.

Business purposes of the personal information we collect and sell

Categories of Personal Information (as per the categories of personal information enumerated in the CCPA)	Business or commercial purposes (as per the purposes enumerated in the CCPA)
Identifiers such as name and email address, that you choose to provide us when you send us an email, complete an online form or register to use our Products.	<ol style="list-style-type: none"> 1. Auditing related to a current interaction with the consumer 2. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity 3. Debugging to identify and repair errors that impair existing intended functionality, including troubleshooting; analyzing performance, fixing errors, and improving the usability and effectiveness of services; ensuring delivery of products, services or communications 4. Providing customer service, maintaining and servicing your account and communicating with you 5. Advertising and marketing our products to you 6. Undertaking activities to verify or maintain the quality or safety of our service and to improve, upgrade, or

	enhance our service and your user experience
Internet Protocol (IP) address identifier that your device uses to connect to the internet	<ol style="list-style-type: none"> 1. Providing data-services, which analyze how consumers consume and shared content on websites 2. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity 3. Undertaking internal research for technological development and demonstration, including analytics to improve our products and services 4. Debugging to identify and repair errors that impair existing intended functionality, including troubleshooting; improving service, analyzing performance, fixing errors, and improving the usability and effectiveness of services; ensuring delivery of products, services or communications 5. Undertaking activities to verify or maintain the quality or safety of our service and to improve, upgrade, or enhance our service and your user experience
Internet or other electronic network activity information	
Location data	
Inferences	

Categories of personal information we sell or disclose for a business purpose

The following are the categories of personal information we sell or disclose for a business purposes, in accordance with the categories of personal information enumerated in the California Consumer Privacy Act of 2018 (CCPA). These are also the categories of information we sold in the past 12 months. A more detailed description of the particular pieces of information is provided in the preceding sections of this policy.

Categories of personal information (as per the categories enumerated in the CCPA)	Categories of third parties to whom the information is disclosed or sold for a business purpose
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Internet Protocol (IP) address identifier that your device uses to connect to the internet	We disclose and sell this information to our clients who operate websites and mobile apps, and who use the data to better understand how online content is consumed and shared, how to monetize that content, and how to better drive incremental traffic
Internet or other electronic network activity information	
Location data	
Inferences	

We do not have actual knowledge that we sell the personal information of minors under 16 years of age.

Your rights as a California consumer under the CCPA

Right to know

You have the right to know the following, which we will provide to you after we receive a verifiable request from you:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting personal information;
- The categories of third parties with whom we share personal information, if any; and
- The specific pieces of personal information we have collected about you.

Right to deletion

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records.

Please note that we may not delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, 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 between you and us;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- 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 our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with an existing legal obligation; or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Right to Non-Discrimination for the exercise of your privacy rights

You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things:

- Deny goods or services to you;
- Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;

- Provide a different level or quality of goods or services to you; or
- Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your personal information.

Right to designate an authorized agent to submit CCPA requests on your behalf

You may designate an authorized agent to make a request under the CCPA on your behalf. To do so, you need to provide the authorized agent written permission to do so and the agent will need to submit to us proof that they have been authorized by you. We will also require that you verify your own identity, as explained below.

If you would like to exercise any of your CCPA rights described above, please:

- Complete a consumer request form available on our website at <https://www.33across.co.uk/user-data-portal/>
or
- Call us, toll-free, at 1-888-297-4094

We will ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information to you, by using a two points of data verification process.

Right to Opt-Out of the Sale of Personal Information

We sell your personal information in certain instances, as explained above under “Categories of personal information we sell or disclose for a business purpose”. You have a right to opt-out of that sale. For additional information visit our [privacy policy](#). If you would like to exercise your right to opt-out, please use the form available on our website at <https://www.33across.co.uk/user-data-portal/>

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