

# Transvault Data Privacy Policy

Last updated: 12 October 2020

## Introduction

Welcome to Transvault Software's privacy policy ('Privacy Policy'). Transvault Software respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our Website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

## Definitions

In this Privacy Policy the following words have the following meanings:

**Clients** means the customers of our Transvault Partners.

**Transvault Partner** means a third-party entity who resells our products (including software) and/or services (as the case may be) pursuant to a contract between us and them.

**Partner Portal** means our online Transvault Partner environment accessible through our Website.

**Partner Program** means our program tailored to our different types of Transvault Partner, further particulars of which are given on our Website.

**Partner Support Process** means the process whereby our technical support team support our Transvault Partners

**Website** means our website accessible through <http://www.transvault.com> or such other URL (as defined below) as we may use from time to time.

## Controller

Transvault Software Ltd is registered in England and Wales under company number 06661457 and have our registered office at Channel Court, 8 Hill Road, Clevedon, BS21 7NE United Kingdom is the controller and is responsible for your personal data (collectively referred to in this Privacy Policy as 'Transvault', 'we' or 'us').

## How to contact us and making a complaint

If you have any questions about this Privacy Policy or our privacy practices, please contact us in the following ways:

- **Name:** Transvault Software Limited
- **Address:** Channel Court, 8 Hill Road, Clevedon, BS21 7NE, United Kingdom
- **Phone Number:** N. America: 646 808 0407; UK & International: +44 (0) 3333 404433
- **Email:** [info@transvault.com](mailto:info@transvault.com)

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK's supervisory authority for data protection issues (<https://www.ico.org.uk>) if you are unhappy with how we have processed your personal data.

However, we would appreciate the chance to deal with your concerns before you approach the ICO and please contact us at If you have any concerns about our use of your personal information, you can make a complaint to us at [dpo@transvault.com](mailto:dpo@transvault.com).

## Who this Policy applies to

This Privacy Policy applies to information collected when you:

- access, use and interact with our website and Partner Portal
- download or use our software;
- receive the benefit of our services;
- purchase our products (including software) and services;
- raise an incident ticket with our Technical Support team;

- express your interest in receiving communications from us; and/or
- otherwise interact with us

## Children

We do not intend for our websites, products (including software) and services to be used by children and we do not knowingly collect personal data from children.

## Changes to this Privacy Policy and your duty to inform us of changes

Occasionally we may choose to update this Privacy Policy. We may need to edit the content of this Privacy Policy to comply with applicable data protection laws or to reflect a change in our business practices.

We will indicate that changes were made by updating the 'Last Updated' date at the top of this Privacy Policy. If we introduce any material changes to this Privacy Policy, we will notify you directly, for instance by sending you a notification or including the information on our Website homepage.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## Third-party links

Our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy policy of every Website you visit.

## The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where identity is not included (anonymous data) or where it has been removed (redacted data) or edited to make it impossible to identify the data subject in question without additional information (pseudonymised data).

To be able to operate as a business, we may collect, store and transfer different kinds of personal data which we have grouped as below:

**Identity Data** includes first name, maiden name, last name, username or similar identifier, title, job title and company or organisation name

**Contact Data** includes e-mail address, telephone numbers, billing address, business address and residential address

**Financial Data** includes bank account and payment card details such as sort codes, account numbers, debit card and credit card numbers

**Transaction Data** includes details about payments to and from you and other details of our products (including software) and services you have purchased.

**Technical Data** includes internet protocol (IP) address, login data, event logs, device identification number and name, browser type and version, internet service provider name, date and time of your visit to our Website, time zone setting and location, browser plug-in type and version, operating system and platform and uniform resource locators ('URLs') of the Website you visit immediately before and after visiting our Website.

**Profile Data** includes your username and password you use to login to our Partner Portal, purchases or orders made by you, your interests, preferences, feedback and survey responses.

**Usage Data** includes information about how you use our Website, products (including software) and services.

**Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users

accessing a specific feature of our Website. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product (including software) or service you have with us but we will notify you if this is the case at the time.

## How is your personal data collected?

**Direct interactions** – you may give us your Identity, Contact and Financial Data when you fill in our online enquiry forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products (including software) or services;
- apply for a role with us;
- create an account on our Website for our Partner Program;
- subscribe to our services or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

Automated technologies or interactions. As you interact with our Website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our Cookies Policy for further details.

Third parties or publicly available sources. We will receive personal data about you, including without limitation Identity, Contact and Financial Data from various third parties as set out below:

- Technology companies such as Microsoft Corporation (as made available by its services);
- Clients where our software is installed on servers owned or used by them;
- Our Transvault Partners;
- Recruitment agencies;
- Social media platforms such as Twitter, LinkedIn and Facebook.

## How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you.
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- where we need to comply with a legal obligation.

Please see the Glossary section below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

## Purposes for which we use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at [dpo@transvault.com](mailto:dpo@transvault.com) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

For an explanation of the meanings of the lawful bases contained in the table below, please see the Glossary section below.

Unless expressed to the contrary, a reference to 'you' in the table means a reference to you as a customer or a Transvault Partner

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you  Necessary for our legitimate interests (to grow our business)
To register you as a Transvault Partner	(a) Identity (b) Contact	Necessary for our legitimate interests (to grow our business)
To process your orders for products (including software) and/or services including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Performance of a contract with you  Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:  (a) Notifying you about changes to our Website terms, Privacy Policy and/or Cookies Policy  (b) Responding to your requests for quotes or further information  (c) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Performance of a contract with you  Necessary to comply with a legal obligation  Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Performance of a contract with you  Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

<p>To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>Necessary to comply with a legal obligation</p>
<p>To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our Website, software/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our products (including software)/services and grow our business)</p>
<p>To supply and enable you to download our software and supply our services to you(including support services in respect of our software)</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Performance of a contract with you</p>
<p>To recruit new members of staff</p>	<p>(a) Identity (b) Contact</p>	<p>Necessary for our legitimate interests (to ensure our company has adequate levels of appropriate staff in order to develop/grow our business)</p>
<p>To engage with you on social media platforms such as Facebook, LinkedIn and Twitter</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>Necessary for our legitimate interests (to engage with you as a customer in order to market and promote our business)</p>

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

## Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products (including software), services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products (including software) or services from us and you have not opted out of receiving that marketing.

## Third-Party Marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

## Opting out

You can ask us to stop sending you marketing messages at any time by using the unsubscribe link in our emails or by contacting us at [marketing@transvault.com](mailto:marketing@transvault.com).

You can ask third parties to stop sending you marketing messages by contacting us at [marketing@transvault.com](mailto:marketing@transvault.com)

## Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly. More information about cookies and other technologies we use can be found in our Cookies Policy.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law

## Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table under the sub-heading **Purposes for which we will use your personal data** above:

- ZenDesk, Inc. and its subsidiaries
- ActiveCampaign, LLC
- Microsoft Corporation
- Third party service providers such as our IT service partners who deliver migration services
- One or more of our Transvault Partners
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy
- Professional advisers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide professional services
- HM Revenue & Customs, regulators and other authorities acting based in the United Kingdom

We recommend you read the privacy policies and any related policies of those third parties identified by name above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## International transfers

Many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure adequate protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- where we use certain service providers, we use specific contracts using wording approved by the European Commission.

The countries where your personal data are transferred may have laws which are different from, and not as protective as, data protection laws of the United Kingdom (including the GDPR).

Please contact us at [dpo@transvault.com](mailto:dpo@transvault.com) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we operate a least privilege policy so that users or resources will be provided with the minimum privileges necessary to fulfil their roles and responsibilities and limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## Data retention

We will only keep the personal information we collected about you for as long as is necessary to fulfil the purpose for which we collected it. When determining how long your information should be retained for, we will take into account the nature and sensitivity of the information, the potential risk of harm from unauthorised disclosure or use, the purpose for which we collected the information and any applicable legal requirements. Therefore, retention periods will differ for specific processing situations, as set out in the examples below:

- When you are a user of our software. We will retain information about you for as long as specified in the relevant customer contract with your employer (if you are an employee) or company (if you are a company officer e.g. a director or company secretary).
- When you provide information to resolve a technical issue. Any sample customer data provided is automatically destroyed 30 days after the closure of the issue ticket.
- When you are our customer. We will retain the information about you for the duration of our business relationship to enable us to communicate with you about our products (including software) and services and meet any other obligations we have committed ourselves to. When our relationship ends, we will comply with our data retention and erasure duties as stated in our contract.
- When you are a job applicant. We will keep your information for the duration of our recruitment process for the job in question, unless you ask us to erase this information earlier.
- Apart from the situations outlined above, we will also hold your information to meet the different legal, accounting and reporting obligations we are subject to.

Details of our Data retention policy during the Partner Support Process can be found [here](#).

## Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are set out and described below:

- Request access to your personal data (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - if you want us to establish the data's accuracy;
  - where our use of the data is unlawful but you do not want us to erase it;
  - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
  - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products (including out software) or services to you. We will advise you if this is the case at the time you withdraw your consent

If you wish to exercise any of the rights above, please contact [dpo@transvault.com](mailto:dpo@transvault.com)

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or you request further copies of your data following a request. Alternatively, we may have the right to refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We will respond to all legitimate requests without delay and in any case within one month. If it could take us longer than a month (for instance if your request is particularly complex or you have made a number of requests) we will notify you of the delay and keep you updated.

## Glossary

**Legitimate interests** means the interests of our business in conducting and managing our business to enable us to give you the best service/software and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of a contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

## California residents – California Consumer Privacy Act

This section supplements the information contained in the rest of our Privacy Policy above and **applies solely to users who reside in the US State of California** ('consumers' or 'you'). We adopt this notice to comply with the California Consumer Privacy Act of 2018, as amended (Cal. Civ. Code §§ 1798.100 to 1798.199), and any related regulations issued by the California Attorney General ('CCPA'), and any terms defined in the CCPA will have the same meaning when used in this section.

The CCPA requires that we describe our collection and disclosure of consumers' personal information by reference to certain statutorily enumerated categories set forth in the statute. Please see the Appendix below for more information about these categories.

### Supplemental information about collection, use, and disclosure

In the past 12 months, we have collected, used, and disclosed the following categories of personal information:

Category of personal information	Category by source	Business or commercial purpose(s) for collection	Categories of third parties with whom we share
Identifiers	Directly from you  Our Transvault Partners  Recruitment agencies  Social media platforms such as Twitter, LinkedIn and Facebook	Security detection/fraud, illegal activity protection  Performance of a contract with you  Managing our relationship with you (including marketing and advertising, responding to your queries or requests for a quote from us, supporting you with our products (including software) and services)  Recruitment of staff  Engagement with you on social media	Our Transvault Partners  Third party service providers (such as Microsoft Corporation, ActiveCampaign LLC and ZenDesk, Inc. and its subsidiaries)
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Directly from you  Our Transvault Partners  Recruitment agencies  Social media platforms such as Twitter, LinkedIn and Facebook	Security detection/fraud, illegal activity protection  Performance of a contract with you  Managing our relationship with you (including marketing and advertising, responding to your queries or requests for a quote from us, supporting you with our products (including software) and services)  Recruitment of staff  Engagement with you on social media	Our Transvault Partners  Third party service providers (such as Microsoft Corporation, ActiveCampaign LLC and ZenDesk, Inc. and its subsidiaries)

Commercial information	Directly or indirectly from you  Our Transvault Partners  Third party service providers	Managing our relationship with you (including marketing and advertising, responding to your queries or requests for a quote from us, supporting you with our products (including software) and services)	Our Transvault Partners
Internet or other similar network activity	Directly or indirectly from you  Third party service providers	Security detection/fraud, illegal activity protection  Internet research and analytics  Managing our relationship with you (including marketing and advertising, responding to your queries or requests for a quote from us, supporting you with our products (including software) and services)	N/A

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.

In the preceding 12 months, we have not sold personal information of consumers.

## Consumer rights under California law

Under certain circumstances, you may have certain rights under California law in relation to your personal information, including:

- Access request rights: Under the CCPA, you may 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, 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 (where applicable);
  - the categories of third parties with whom we share that personal information;
  - the specific pieces of personal information we collected about you; and
  - if we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
    - sales, identifying the personal information categories that each category of recipient purchased; and
    - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- Deletion request rights. Under the CCPA, you may have the right to request that we delete personal information that we have collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies, in which case we will notify you and identify that exception.
- 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 our products (including our software) or services;
  - charge you different prices or rates for our products (including software) or services;
  - provide you a different level or quality of products (including software) 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.

- Opt-out of sale request rights. The CCPA provides a right to opt-out of the sale of personal information, as that term is defined in the statute. However, we do not sell California consumer personal information for monetary or other valuable consideration. For clarity, we also do not sell the personal information of consumers we know are less than 16 years of age.
- California's "Shine the Light" law. Under California's "Shine the Light" law (Civil Code Section § 1798.83), users of our website that are California residents may request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We will obtain your express opt-in consent before we disclose your personal information to third parties for their direct marketing purposes. If you do not provide express opt-in consent, we will not disclose such personal information.

To exercise the access and deletion rights described above, please submit a verifiable consumer request to us by contacting [dpo@transvault.com](mailto:dpo@transvault.com).

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must: (i) provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative and (ii) 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.

We endeavour to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (which may be up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 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.

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

## Appendix

### CCPA Personal Information Categories

Categories	Examples
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.
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.
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Internet or other similar network activity	

	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement
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