

SUPPLEMENTAL CALIFORNIA CONSUMER PRIVACY ACT DISCLOSURES

The following California Consumer Privacy Act Disclosures ("CCPA Disclosures") supplement the TRUE Space U.S. Privacy Policy ("TRUE Space," "we") in order to disclose information about our data processing practices as required by the California Consumer Privacy Act of 2018 ("CCPA"). These CCPA Disclosures are effective January 1, 2021.

I. Who We Are and Scope of this Privacy Policy

California residents are protected as "consumers" by the California Consumer Privacy Act of 2018 with respect to personal information.

Certain categories of personal data are statutorily excluded from the CCPA and these CCPA Disclosures, including the following:

- (1) personal information reflecting a written or verbal communication or a transaction between a business and a consumer, where the consumer is a natural person who is acting as an employee, owner, director, officer, or contractor of a company, partnership, sole proprietorship, non-profit, or government agency and whose communications or transaction with the business occur solely within the context of the business conducting due diligence regarding, or providing or receiving a product or service to or from such company, partnership, sole proprietorship, non-profit, or government agency;
- (2) personal information that is collected by a business about a natural person in the course of the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the natural person's personal information is collected and used by the business solely within the context of the natural person's role or former role as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or a contractor of that business;
- (3) personal information that is collected by a business that is emergency contact information of the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the personal information is collected and used solely within the context of having an emergency contact on file; and
- (4) personal information that is necessary for the business to retain to administer benefits for another natural person relating to the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the personal information is collected and used solely within the context of administering those benefits.

II. How can a consumer with a disability access these CCPA Disclosures?

Consumers who have a visual disability may be able to use a screen reader or other text-to-speech or text-to-Braille tool to review the contents of this notice.

III. CCPA Notice at Collection Online

We address "at collection" disclosure requirements in our Privacy Notice (see Section I., "Who and what information is subject to these CCPA Disclosures").

IV. CCPA Privacy Policy

Beyond the disclosures in the preceding "CCPA Notice At Collection Online" section, we are providing additional disclosures about consumer rights and our personal information handling practices in the preceding twelve (12) months, as required by the CCPA.

1. Right to Know About Personal Information Collected, Used, or Disclosed

This CCPA Privacy Policy describes the personal information we generally collect, use, and disclose about California residents. You have the right to request that we disclose what personal information we collect, use, and disclose about you specifically ("right to know"). To submit a request to exercise the right to know or for information on self-service procedures (where available), please call us at 888-308-8783 or submit an email request to office@truesp.com and include "California Request to Know" in the subject line. Please specify in your request the details you would like to know, including any specific pieces of personal information you would like to access.

We may ask that you provide certain information to verify your identity. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. We will respond to your request in accordance with the CCPA. If we deny requests, we will explain why.

2. Our Personal Information Handling Practices in 2020

We have set out below the categories of personal information we have collected about California residents in the preceding twelve (12) months and, for each category of personal information collected, the categories of sources from which that information was collected, the business or commercial purposes for which the information was collected, and the categories of third parties with whom we shared the personal information.

Category of personal information	We collected such personal information to use for the following business or commercial purposes:	We have collected such personal information from the following categories of sources:	We shared* such personal information with the following categories of third parties: *Sharing may be based on your instructions (e.g., through your use of a Service, a social media widget, third-party integration, etc).
Identifiers such as 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.	To provide, operate and support our website and related Services; to address and respond to service, security, and customer support issues; to detect, prevent, or otherwise address technical issues; to detect, prevent, or otherwise address fraud, security issues, and unlawful activities; to comply with applicable law; to fulfill and perform contractual agreements and obligations; to improve and enhance our website and related Services; to provide analysis or	<ul style="list-style-type: none">• Directly or indirectly from the California resident.• Directly or indirectly from other publicly available websites with permissible terms and conditions, customers, and business partners.• In a business-to-business context,	<ul style="list-style-type: none">• No other parties

Category of personal information	We collected such personal information to use for the following business or commercial purposes:	We have collected such personal information from the following categories of sources:	We shared* such personal information with the following categories of third parties: *Sharing may be based on your instructions (e.g., through your use of a Service, a social media widget, third-party integration, etc).
	valuable information back to our customers and users; to update, maintain, use and analyze our records; to identify prospects for marketing and provide products, Services, ads and other communications that may be of interest to you; and to understand how you use our website, what you like and dislike, and where you may have run into problems which need to be addressed.	from the business that employs the California resident.	
Any categories of personal information described in subdivision (e) of Section 1798.80: "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records."	<p>To provide, operate and support our website and related Services; to address and respond to service, security, and customer support issues; to detect, prevent, or otherwise address fraud, security issues, and unlawful activities; to comply with applicable law; to fulfill and perform contractual agreements and obligations; to provide analysis or valuable information back to our customers and users; to update, maintain, use and analyze our records; and to identify prospects for marketing and provide products, Services, ads and other communications that may be of interest to you.</p> <p>For the avoidance of doubt, TRUE Space will not use your information in a manner that is inconsistent with or contrary to its original purposes of collection – sometimes called an 'incompatible purpose.' Many of the information types in the preceding definition are statutory but not requested, required, or utilized by TRUE Space either at all or for an inconsistent business purpose or otherwise.</p>	<ul style="list-style-type: none"> • Directly or indirectly from the California resident. • Directly or indirectly from other publicly available websites with permissible terms and conditions, customers, and business partners. • In a business-to-business context, from the business that employs the California resident. 	<ul style="list-style-type: none"> • No other parties
Characteristics of protected classifications under California or	N/A (subject to statutory exceptions described in Section I above)	N/A (subject to statutory exceptions described in Section I above)	N/A (subject to statutory exceptions described in Section I above)

Category of personal information	We collected such personal information to use for the following business or commercial purposes:	We have collected such personal information from the following categories of sources:	We shared* such personal information with the following categories of third parties: *Sharing may be based on your instructions (e.g., through your use of a Service, a social media widget, third-party integration, etc).
federal law, including age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (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).			
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	To provide, operate and support our website and related Services; to address and respond to service, security, and customer support issues; to detect, prevent, or otherwise address fraud, security issues, and unlawful activities; to comply with applicable law; to fulfill and perform contractual agreements and obligations; to update, maintain, use and analyze our records; and to identify prospects for marketing and provide products, Services, ads and other communications that may be of interest to you.	<ul style="list-style-type: none"> • Directly or indirectly from the California resident. • Directly or indirectly from other publicly available websites with permissible terms and conditions, customers, and business partners. • In a business-to-business context, from the business that employs the California resident. 	<ul style="list-style-type: none"> • No other parties
Biometric information.	N/A	N/A	N/A
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	To provide, operate and support our website and related services; to address and respond to service, security, and customer support issues; to detect, prevent, or otherwise address technical issues; to detect, prevent, or otherwise address fraud, security issues, and unlawful activities; to improve and enhance our website and related services; to provide analysis or valuable information back to our customers and	<ul style="list-style-type: none"> • Directly or indirectly from the California resident. • Directly or indirectly from other publicly available websites with permissible terms and conditions, customers, and business partners. • In a business-to-business context, 	<ul style="list-style-type: none"> • No other parties

Category of personal information	We collected such personal information to use for the following business or commercial purposes:	We have collected such personal information from the following categories of sources:	We shared* such personal information with the following categories of third parties: *Sharing may be based on your instructions (e.g., through your use of a Service, a social media widget, third-party integration, etc).
	users; to identify prospects for marketing and provide products, services, ads and other communications that may be of interest to you; and to understand how you use our website, what you like and dislike, and where you may have run into problems which need to be addressed.	from the business that employs the California resident.	
Geolocation data.	To provide, operate and support our website and related Services; to address and respond to service, security, and customer support issues; to detect, prevent, or otherwise address technical issues; to detect, prevent, or otherwise address fraud, security issues, and unlawful activities; to comply with applicable law; and to fulfill and perform contractual agreements and obligations;	<ul style="list-style-type: none"> • Directly or indirectly from the California resident. • Directly or indirectly from other publicly available websites with permissible terms and conditions, customers, and business partners. • In a business-to-business context, from the business that employs the California resident. 	<ul style="list-style-type: none"> • No other parties
Audio, electronic, visual, thermal, olfactory, or similar information.	N/A	N/A	N/A
Professional or employment-related information.	N/A (subject to statutory exceptions described in Section I above)	N/A (subject to statutory exceptions described in Section I above)	N/A (subject to statutory exceptions described in Section I above)
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99)	N/A (subject to statutory exceptions described in Section I above)	N/A (subject to statutory exceptions described in Section I above)	N/A (subject to statutory exceptions described in Section I above)
Inferences drawn from any of the information	To provide, operate and support our website and related	Based on personal information collected from	<ul style="list-style-type: none"> • No other parties

Category of personal information	We collected such personal information to use for the following business or commercial purposes:	We have collected such personal information from the following categories of sources:	We shared* such personal information with the following categories of third parties: *Sharing may be based on your instructions (e.g., through your use of a Service, a social media widget, third-party integration, etc).
identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Services; to detect, prevent, or otherwise address fraud, security issues, and unlawful activities; to improve and enhance our website and related services; to identify prospects for marketing and provide products, services, ads and other communications that may be of interest to you; and to understand how you use our website, what you like and dislike, and where you may have run into problems which need to be addressed.	the categories of sources described above.	

3. Disclosures of Personal Information; No Sale

Over the preceding twelve (12) months, we disclosed certain categories of California residents' personal information to the categories of third parties as shown in the table above.

We have not sold California residents' personal information over the preceding twelve (12) months and do not do so. This includes the personal information of minors under sixteen (16) years of age.

4. Right to Request Deletion of Personal Information

You have a right to request the deletion of personal information that we collect or maintain about you. To submit a request to delete personal information or for information on our self-service data deletion procedures (where available), please visit our TRUE Space Contact Us Page or submit an email request to office@truesp.com and include "California Request to Delete" in the subject line. Please specify in your request the personal information about you that you would like to have deleted, which can be all of your personal information as required by the CCPA.

We may ask that you provide certain information to verify your identity. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Once we have verified your identity, we will ask you to confirm that you wish to have your personal information deleted. Once confirmed, we will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

5. Right to Opt-Out of the Sale of Personal Information

You have the right to opt-out of the sale of your personal information by a business. We have not and do not sell your personal information.

6. Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

You may not be discriminated against because you exercise any of your rights under the CCPA in violation of Cal. Civ. Code §1798.125.

7. Authorized Agent

You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity registered with the Secretary of State of California; and
- You sign a written declaration that you authorize the authorized agent to act on your behalf.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please have the authorized agent take the following steps in addition to the steps described above:

- Mail your written declaration authorizing the authorized agent to act on your behalf, certified by a California notary public, to Attn: TRUE Space Legal Department (Privacy Team), 2400 Herodian Way SE, Suite 220, Smyrna, GA 30080 with an e-mail cc: to office@truesp.com and
- Provide any information we request in our response to your email to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4000 to 4465, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

8. Contact for More Information

If you have questions or concerns regarding these CCPA Disclosures, our Privacy Policy or practices, you may contact us using the following details:

Email address: office@truesp.com

Postal address: Attn: TRUE Space Legal Department (Privacy Team), 2400 Herodian Way SE, Suite 220, Smyrna, GA 30080 with an e-mail cc: to office@truesp.com.