

## California Consumer Privacy Act Disclosures

In these California Consumer Privacy Act Disclosures (“**CCPA Disclosures**”), we, Ingenio, LLC (collectively “**Keen.com and LiveAdvice.com**”), disclose information about our data processing practices as required by the California Consumer Privacy Act of 2018 (“**CCPA**”) and supplement the disclosures in any CCPA Notice at Collection issued in addition to the CCPA Notice at Collection Online provided in Section II below. These CCPA Disclosures are effective May 20, 2020.

### I. Who and what information is subject to these CCPA Disclosures?

California residents are protected as “consumers” by the CCPA with respect to their personal information.

A number of statutory exceptions apply under the CCPA and to these CCPA Disclosures, including the following:

- (1) personal information reflecting a written or verbal communication or a transaction between the business and the 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
- (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. CCPA Notice at Collection Online

In this CCPA Notice at Collection Online, we are addressing disclosure requirements under California Civil Code § 1798.100(b) and California Attorney General Regulations § 999.305 at or before the point of online collection. We collect the following categories of personal information about consumers and for the following business or commercial purposes:

When you use or access any of our websites, mobile applications, and other digital platforms linking to or posting the Privacy Policy (each a “**Platform**”), we may collect a variety of information about you and others, as described below. Such information includes, but is not limited to, information about you which is in a form that permits us to identify you (your “**personal data**”).

#### A. Personal Data About You That You Provide.

When you use or access any of our Platforms, we may ask you to provide us with certain personal data, including but not limited to some or all of the following: your name, username, email address, telephone number, current and previous mailing addresses, credit or debit card or PayPal account information, payment address, other financial account number, social security number or tax identification number, driver's license number or other government issued identification number (or a copy of your driver's license or other government issued identification card), date of birth, time of birth, birth location, login, PIN, password, account preferences, and time zone. You may be asked for this information at various times when interacting with our Platforms, such as when registering to be a user of any of our services, when making a purchase through any of our Platforms, or when filling out a form or survey or participating in a promotion through our Platforms.

#### **B. Personal Data About You That We Collect Via Technology.**

When you use or access any of our Platforms, we may also collect certain personal data through automated means, including but not limited to some or all of the following: your mobile phone number, unique device ID, device type, machine ID, geolocation information, computer and connection information, browser type, Internet Protocol ("IP") address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and date and time stamps for your visits. We also may collect any telephone number from which you contact us, or from which you place a call to another user through our calling feature on any of our Platforms. (If you call any user or other person directly—that is, not through the calling feature on any of our Platforms—your telephone number may be obtained by the person called.)

We may monitor or record your live telephone conversations with other users through the Platform for operational purposes, including for quality assurance purposes and in furtherance of making certain services available to you.

#### **C. Information About You That We Collect From Others.**

When you use or access any of our Platforms, we may also collect your name and email address from your friends who suggest to us that you may wish use one of our Platforms. If we receive this personal data about you in this way, we will contact you to let you know that you have been recommended to us. If you do not respond to our outreach or you ask us to delete your personal data, we will do so.

When you use or access certain of our Platforms, we may also collect your name, address, phone number, and geolocation information from other third parties, such as identity verification vendors which we engage.

#### **D. Information About Others That We Collect From You.**

When you use or access any of our Platforms, you may decide to provide us with information about a third party, such as your friends' names and email addresses in connection with our "tell a friend" features.

#### **E. Information Provided to Social Networking Sites.**

Some of our Platforms may include the ability for you and other users to connect your profile on our Platform with Facebook or other social networking sites (each, a "SNS"), such as via the "Connect to Facebook" functionality, whether you initially connect from our Platform to the SNS or in the other direction from the SNS

to our Platform. We may receive or access information about you through the SNS when you choose to connect your Platform profile to any SNS, or to post or otherwise share information on any SNS to which you have connected your Platform profile. Note that any information that you or others post to an SNS will be accessible by any users of such SNS, subject to its terms of service and privacy policy.

#### **F. Other Information That We Collect Via Technology.**

When you use or access our Platforms, we also may collect certain information through automated means associated with your activities on our Platforms, including information about the way you interact with any of our Platforms or any content thereon, statistics regarding your page views and traffic to and from our Platforms, and the number of bytes transferred, hyperlinks clicked, and other actions you take on our Platforms. Each of our Platforms may also track information such as the URL that you visited before you come to the Platform and the URL to which you next go. As with most websites and other digital platforms, we also employ cookies, pixel tags, web beacons, and similar technologies on our Platforms to collect and store certain information about visitors to our Platforms, to improve our services, and to help us remember you and your preferences when you revisit our Platforms. For more information about our practices in this area for a particular Platform, please see our Cookies Policy linked in the footer of such Platform.

#### **G. Information in Your Inquiries and Posts.**

We also collect any information you send to us or other users through any of our Platforms, including information about you in correspondence, mail, and chats conducted through a Platform, and responses to our customer satisfaction surveys or customer service communications. We also collect information from content you post in online reviews, comments, forums, or blogs on our Platforms.

We may use information collected about you for a variety of business and commercial purposes, including the following:

- enable your participation in activities on our Platforms;
- provide our offerings and services to you;
- confirm your identity;
- enforce our Platform policies and terms of service, and investigate potential violations of such policies or terms;
- fulfill an order that you place through any of our Platforms, including to process payment for any purchase made through any of our Platforms;
- respond to inquiries that you may have about any of our Platforms or services;
- administer your account on any of our Platforms;
- display our content based upon your interests
- enable you to search information on our Platforms;
- list in our search and directory services any users who provide services through one of our Platforms;
- contact you regarding customer service and customer surveys;

- assess your needs and interests in our products and services in order to better tailor our offers and/or advertising;
- improve our Platforms;
- inform you of changes made to our Platforms;
- organize or carry out promotional activities, games or promotional events;
- inform you of products, services, promotions, offers, and competitions which you may find interesting, provided you have not opted out of receiving such information or, where required, we have your express consent;
- conduct research;
- understand general customer trends and patterns so we can develop and support existing and ongoing marketing strategies for our products and services; and
- conduct other marketing and commercial activities.

We may also use information about you that we collect in connection with your use of our Platforms for security, administrative, and legal purposes (including to detect, prevent, or otherwise address fraud, security or technical issues).

Also, we may combine information about you that we collect in connection with your use of our Platforms with other records (such as those obtained from third parties) to develop a customer profile relating to you.

The CCPA Privacy Policy is available immediately [below](#).

### **III. CCPA Privacy Policy**

Beyond the disclosures in the preceding “Notice At Collection Online” segment and any other Notice at Collection, we are providing additional disclosures about consumer rights and our personal information handling practices in the preceding twelve months, as required by the CCPA and regulations of the California Attorney General, including § 999.308 (Privacy Policy).

#### **1. Right to Know About Personal Information Collected, Disclosed, or Sold**

This CCPA Privacy Policy describes personal information we generally collect, use, disclose and sell about California residents. You have the right to request that we disclose what personal information we collect, use, disclose and sell about you specifically (“**right to know**”). To submit a request to exercise the right to know, please submit an email request to [privacy@ingenio.com](mailto:privacy@ingenio.com) or mail a written request to our address at the end of this document and include “California Request to Know” in the subject line of your request. 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 will ask that you provide certain information to verify your identity, such as a code sent to an email address we may have on file for you. 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 your request, we will explain why.

**2. Our Personal Information Handling Practices in the preceding 12 months**

We have set out below categories of personal information we have collected about California residents in the preceding 12 months and, for each category of personal information collected, whether the category was disclosed for a business purpose and the categories of third parties to whom we disclosed the personal information.

<b>A. Categories of personal information as referenced in Cal. Civ. Code 1798.130 (c)</b>	<b>B. Categories of personal information that we collected about the consumer (by reference to the enumerated category or categories in column A that most closely describes the personal information collected)</b>	<b>C. Was the personal information described in in column B disclosed for a business purpose?</b>	<b>D. We disclosed personal information in one or more categories listed in column B to the following categories of third parties:</b>
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.	Name, username, email address, current and previous mailing addresses, social security number or tax identification number, driver’s license number or other government issued identification number (or a copy of driver’s license or other government issued identification card), unique device ID, machine ID, Internet protocol address.	Yes	<ul style="list-style-type: none"> <li>• Affiliated and third-party service providers, who provide a variety of services related to the operation of our business.</li> <li>• With your consent and at your direction, to SNSs, other users of our Platforms, and the general public.</li> <li>• In rare circumstances, we may also have disclosed personal information to advisors, law enforcement authorities, and other third parties, such as in the context of law enforcement investigations, as described in the privacy policy that applies to our Platforms.</li> </ul>
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, social security number, address, telephone number, passport number, driver’s license or state identification card number, bank account number, credit card number,	Telephone number, mobile phone number, payment address, credit or debit card or PayPal account information, other financial account number, information about you in correspondence, mail, and chats conducted through a Platform, information you post or otherwise share on any SNS to which you have connected your Platform profile, content you post in online reviews, comments, forums, or blogs on our Platforms, date of birth, time of birth, birth	Yes	Same as above.

<p>debit card number, or any other financial 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>	<p>location, login, PIN, password, account preferences, time zone, any telephone number from which you contact us or from which you place a call to another user through our calling feature on any of our Platforms, device type, computer and connection information, browser type, domain name, and date and time stamps for your visits.</p>		
<p>Characteristics of protected classifications under California or 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).</p>	<p>It is possible that users of our site relay such information to each other in which case it would be temporarily stored in chat or email transcripts that we store for security, administrative, and legal purposes (including to detect, prevent, or otherwise address fraud, security or technical issues).</p>	<p>Yes</p>	<p>Same as above.</p>
<p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. Responses to our customer satisfaction surveys or customer service communications.</p>	<p>Yes</p>	<p>Same as above.</p>
<p>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.</p>	<p>Cookies, pixel tags, web beacons, information such as the URL that you visited before you come to the Platform and the URL to which you next go, information about the way you interact with any of our Platforms or any content thereon, statistics regarding your page views and traffic to and from our Platforms, and the number of bytes transferred, hyperlinks clicked, and other actions</p>	<p>Yes</p>	<p>Same as above.</p>

	you take on our Platforms.		
Geolocation data.	Geolocation information.	Yes	Same as above.
Audio, electronic, or similar information.	Live telephone conversations with other users through the Platform.	Yes	Same as above.

### 3. Disclosures of Personal Information; No Sales

Over the preceding 12 months, we disclosed certain categories of California residents’ personal information to the categories of third parties as shown in the table above. The brands associated with the marketplace side of our business (*i.e.*, Keen.com and LiveAdvice.com) do not sell, and in the preceding 12 months did not sell, California residents’ personal information. We do not have actual knowledge that we sell the personal information of minors under 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, please submit an email request to [privacy@ingenio.com](mailto:privacy@ingenio.com) or mail a written request to our address at the end of this document 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 will ask that you provide certain information to verify your identity, such as a code sent to an email address we may have on file for you. 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 confirmed, we will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

### 5. 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.

### 6. 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 in Sections 2 and 3 above:

- Mail a certified copy of your written declaration authorizing the authorized agent to act on your behalf to 182 Howard Street, #826, San Francisco, CA 94105; 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.

## **7. Contact for More Information**

If you have questions or concerns regarding our privacy policy or practices, you may contact us using the following details:

Email address: [privacy@ingenio.com](mailto:privacy@ingenio.com)

Postal address: 182 Howard Street, #826, San Francisco, CA 94105

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