

## California Consumer Privacy Act (CCPA) Privacy Notice

Associated Sales Group of America, Inc. (“ASG”, “Company”, “we”, “our”, or “us”) takes your privacy seriously. We want you to know how we collect, use, share, and protect your Personal Information and about the rights of California Consumers under California law. This California Privacy Notice applies to California consumers. We provide you this supplementary privacy statement to comply with the California Consumer Privacy Act of 2018 (“CCPA”) which takes precedence over our general privacy statement available at: <https://clicoo4.dreamhosters.com/privacy/>

### Assistance for the Disabled

Alternative formats of this Privacy Statement are available to individuals with a disability. Please contact us at [privacy@asgusa.net](mailto:privacy@asgusa.net) for assistance.

### This California Privacy Notice addresses the following topics

- The Scope of this California Privacy Notice
- The Collection, Use and Disclosure of Personal Information
- Your California Privacy Rights
- How to Exercise Your Rights
- How We Will Verify Your Requests
- Requests by Authorized Agents
- The Company’s Non-Discrimination Policy
- Your Right to Information About Disclosures of Personal Information for Direct Marketing Purposes
- Your “Do Not Track” Browser Setting
- Third-Party Links and Services
- Children
- Changes to This California Privacy Notice

### The Scope of this California Privacy Notice

#### What is Personal Information?

“Personal Information”. “Personal Information” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California Consumer or household.

#### Whose Personal Information is Covered by this California Privacy Notice?

This CCPA applies to the Personal Information of residents of the State of California in their capacity as consumers (“California Consumers”).

#### What Personal Information Does this California Privacy Notice Cover?

This California Privacy Notice applies to all Personal Information of California Consumers that we collect both online and offline, including through California Consumers’ (a) visits to our website, and (b) use of our products, applications, or services that references this California Privacy Notice (collectively, the “Services”).

#### Whose Personal Information is not Covered by this California Privacy Notice?

For purposes of this California Privacy Notice, “Consumer” does not include:

- California residents who are ASG’s employees, job applicants, owners, directors, officers, or contract workers (collectively, “HR Individuals”), or the emergency contacts of HR Individuals or the dependents or spouses who receive ASG benefits by virtue of their relationship to an HR Individual in their capacities as HR Individuals or emergency contacts, dependents, or spouses; or
- California residents who are employees or other agents of a business engaged in a transaction with ASG in their capacities as employees or agents of that business.

## **The Collection, Use and Disclosure of Personal Information**

### **Categories of Personal Information Collected**

In the last 12 months, ASG collected the following categories of Personal Information about California Consumers:

- **Identifiers**, including: real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, and account name.
- **Categories described in California Civil Code § 1798.80(e)** (except those already listed in “Identifiers” above), including: medical information, photograph, signature, insurance policy number, credit card number, debit card number, or any other financial information.
- **Characteristics of protected classifications under California or federal law**, including: gender identity, gender expression (when you enquire about our services and provide your title, we will address you accordingly (for example as Mr. or Mrs.)).
- **Commercial information**, including: products and services purchased; purchase, service, and installation dates.
- **Internet or other electronic network activity information**, including:
- **Geolocation data**, including: physical location or movements.
- **Sensory information**, including: Audio, electronic, visual, thermal, olfactory, or similar information. Some of our products can record camera feeds. When you record a camera feed, we collect audio and video information.
- **Professional or Employment-Related Information**. The CCPA does not provide examples for of what information falls into this category. We consider that the following constitutes professional or employment-related information: job title, employer, skill set, professional interests, years of service, performance information.
- **Profile information**, including: attitudes collected from open-ended comments left by users on Company website; purchasing patterns. We use very limited profiling in relation to the products sold to professionals where we analyze purchasing histories to infer future demand.

### **Sources of Personal Information and Purposes for Using Personal Information**

In the last 12 months, Company collected the categories of Personal Information listed above from the following sources and used those categories of Personal Information for the following purposes:

Categories of Personal Information Collected in the Last 12 Months	Sources of that Personal Information	Business Purposes and Commercial Purposes for Collecting that Personal Information
<b>Identifiers</b>	From the California Consumer	<ul style="list-style-type: none"> <li>• Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting impressions to unique visitors, verifying positioning and quality of impressions, and auditing compliance with the law.</li> <li>• Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</li> <li>• Short-term, transient use.</li> <li>• Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, and providing analytic services.</li> <li>• Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback.</li> </ul>
<b>Categories described in Cal. Civ. Code § 1798.80(e)</b>	From the California Consumer	<ul style="list-style-type: none"> <li>• Short-term, transient use.</li> <li>• Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, and providing analytic services.</li> <li>• Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback.</li> </ul>
<b>Characteristics of protected classifications under California or federal law</b>	From the California Consumer	<ul style="list-style-type: none"> <li>• Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback.</li> </ul>

Categories of Personal Information Collected in the Last 12 Months	Sources of that Personal Information	Business Purposes and Commercial Purposes for Collecting that Personal Information
<b>Commercial information</b>	From the California Consumer	<ul style="list-style-type: none"> <li>• Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting impressions to unique visitors, verifying positioning and quality of impressions, and auditing compliance with the law.</li> <li>• Short-term, transient use.</li> <li>• Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, and providing analytic services.</li> <li>• Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback.</li> </ul>
<b>Internet or other electronic network activity information</b>	Automated technologies in the website	<ul style="list-style-type: none"> <li>• Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting impressions to unique visitors, verifying positioning and quality of impressions, and auditing compliance with the law.</li> <li>• Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</li> <li>• Short-term, transient use.</li> <li>• Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, and providing analytic services.</li> <li>• Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback.</li> </ul>
<b>Geolocation data</b>	ISP provided geolocation	<p>The purposes listed for “Identifiers,” except for:</p> <ul style="list-style-type: none"> <li>• Understanding market behavior for optimization of</li> </ul>

Categories of Personal Information Collected in the Last 12 Months	Sources of that Personal Information	Business Purposes and Commercial Purposes for Collecting that Personal Information
<b>Sensory information</b>	<p>tracked by google</p> <p>From the California Consumer</p>	<p>business resource deployment.</p> <ul style="list-style-type: none"> <li>• Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting impressions to unique visitors, verifying positioning and quality of impressions, and auditing compliance with the law.</li> <li>• Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</li> <li>• Short-term, transient use.</li> <li>• Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, and providing analytic services.</li> <li>• Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and communicating with current and prospective customers, including regarding questions and feedback.</li> </ul>
<b>Profile information</b>	<p>From the California Consumer</p>	<ul style="list-style-type: none"> <li>• Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting impressions to unique visitors, verifying positioning and quality of impressions, and auditing compliance with the law.</li> <li>• Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.</li> <li>• Short-term, transient use.</li> <li>• Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, and providing analytic services.</li> <li>• Facilitating communications, for example, by collecting and organizing contact information, establishing means of communications, and</li> </ul>

<b>Categories of Personal Information Collected in the Last 12 Months</b>	<b>Sources of that Personal Information</b>	<b>Business Purposes and Commercial Purposes for Collecting that Personal Information</b>
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communicating with current and prospective customers, including regarding questions and feedback.

Disclosure of Personal Information to Third Parties

In the last 12 months, Company disclosed the following categories of Personal Information about California Consumers to the following categories of third parties for a business or commercial purpose:

<b>Category of Personal Information</b>	<b>Categories of Third Parties</b>
<b>Identifiers</b>	<ul style="list-style-type: none"> <li>• Service Providers, including providers of Data Collection Technologies, providers of data analytics services, website providers, and e-commerce vendors</li> <li>• Government agencies, law enforcement, and other parties as required by law, including in litigation</li> </ul>
<b>Categories described in Cal. Civ. Code § 1798.80(e)</b>	<ul style="list-style-type: none"> <li>• Service Providers, including providers of Data Collection Technologies, providers of data analytics services, website providers, and e-commerce vendors</li> <li>• Government agencies, law enforcement, and other parties as required by law, including in litigation</li> </ul>
<b>Characteristics of protected classifications under California or federal law</b>	<ul style="list-style-type: none"> <li>• Service Providers, including providers of Data Collection Technologies, providers of data analytics services, website providers, and e-commerce vendors</li> <li>• Government agencies, law enforcement, and other parties as required by law, including in litigation</li> </ul>
<b>Commercial Information</b>	<ul style="list-style-type: none"> <li>• Service Providers</li> </ul>
<b>Internet or Other Electronic Network Activity Information</b>	<ul style="list-style-type: none"> <li>• Service Providers, including providers of Data Collection Technologies, providers of data analytics services, and website</li> </ul>

Category of Personal Information	Categories of Third Parties
	providers
Geolocation Information	<ul style="list-style-type: none"> <li>Government agencies, law enforcement, and other parties as required by law, including in litigation</li> </ul>
Sensory Information	<ul style="list-style-type: none"> <li>Service Providers</li> </ul>
Profile Information	<ul style="list-style-type: none"> <li>Service Providers, including providers of Data Collection Technologies, providers of data analytics services, and website provider</li> </ul>

No Sale of Personal Information

ASG does not sell California Consumers' Personal Information.

**Your California Privacy Rights**

Right to Know

California Consumers have the right to submit a verifiable request to know:

- The categories and specific pieces of Personal Information that the Company has collected about them;
- The categories of sources from which the Company collected the Personal Information;
- The categories of Personal Information that the Company sold or disclosed to a third party (other than a service provider) for a business purpose and the categories of recipients of that information; and
- The business or commercial purposes for the Company's collection, disclosure, or sale of the Personal Information.

Right to Delete

California Consumers have the right to submit a verifiable request for deletion of their Personal Information that the Company has collected from the Consumer.

Right to Opt Out of Sale of Personal Information

Under the CCPA, the right to opt out of sale allows you to tell us not to sell your personal information. However, as stated above, the Company does not and will not sell Personal Information.

**How to Exercise Your Rights**

We will respond to requests in accordance with applicable law if it can verify the identity of the individual submitting the request. California Consumers can exercise their rights by contacting us by telephone at (866) 44-7007.

## **Requests by Authorized Agents**

You may designate an authorized agent to exercise your right to know or your right to delete by submitting to us a completed “Authorized Agent Designation” form. You can obtain the designation form by contacting us at [privacy@asgusa.net](mailto:privacy@asgusa.net).

If an authorized agent submits a request to know or a request to delete on your behalf, the authorized agent must submit with the request either (a) a power of attorney that is valid under California law, or (b) a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you to follow the applicable process described above for verifying your identity.

## **How We Will Verify Your Requests**

The processes that we follow to verify that the person making a request to know or a request to delete is the person about whom we have collected personal information are described below. The relevant process depends on how and why the request is submitted.

### **Requests Through Your Password-Protected Account**

If you created a password-protected account with us before the date of your request, we will rely on the fact that your request has been submitted through your account as verification of your identity. We will require that you re-authenticate yourself before we disclose your personal information in response to a request to know and before we delete your personal information in response to a request to delete.

You are responsible for protecting the security of your log-in credentials for your account. Please do not share your log-in credentials with anyone. If we suspect fraudulent or malicious activity on or from your account, we will not respond to a request to know or a request to delete until we have been able to confirm, through further verification procedures, that you made the request.

### **Requests Other Than Through a Password-Protected Account**

If you submit a request by any means other than through a password-protected account that you created before the date of your request, the verification process that we follow will depend on the nature of your request as described below:

**Requests to Know Categories of Personal Information:** We will match at least two data points that you provide with your request to know, or in response to our request for verification information, against information about you we already have in our records and that we have determined to be reliable for purposes of verifying your identity. Examples of relevant data points include your mobile phone number, your zip code, or information about products or services that you have purchased from us.

**Requests to Know Specific Pieces of Personal Information:** We will match at least three data points that you provide with your request to know, or in response to our request for verification information, against information that we already have about you in our records and that we have determined to be reliable for purposes of verifying your identity.

**Requests to Delete Personal Information:** Our process for verifying your identity will depend on the sensitivity (as determined by Company) of the personal information that you ask us to delete. If we cannot verify your identity based on our processes, we may ask you for additional verification information. If we do so, we will permanently delete the verification information that you provide promptly after we have completed the verification process. We will not use that information for any purpose other than



verification. If we cannot verify your identity to a sufficient level of certainty to respond to your request, we will let you know promptly and explain why we cannot verify your identity.

### **The Company's Non-Discrimination Policy**

California Consumers have the right not to be subject to discriminatory treatment by the Company for exercising their privacy rights under the CCPA, and Company will not discriminate on that basis. However, the Company may charge a California Consumer a different price or rate or provide a different level or quality of goods or services if the difference is reasonably related to the value provided to the California Consumer by the Consumer's Personal Information. If the Company does so, it will provide Consumers with any legally required notice.

### **Your Right to Information About Disclosures of Personal Information for Direct Marketing Purposes:**

Under California law, California Consumers can request information from us whether we have disclosed Personal Information to any third parties for the third parties' direct marketing purposes. We will not sell your Personal Information to, or share it with, third-party companies for their direct marketing purposes without your consent. California Consumers desiring to request further information about our compliance with these laws or who have questions or concerns about our privacy practices and policies are welcome to contact us using the contact information below.

### **Your 'Do Not Track' Browser Setting**

The Site collects personally identifiable information about your online activities over time and across third-party websites or online services. We support the Do Not Track (DNT) browser setting. DNT is a preference you can set in your browser's settings to let the websites you visit, including the Site, know that you do not want the sites collecting your personally identifiable information.

### **Third-Party Links and Services**

We provide links to third party websites operated by organizations not affiliated with the Company. We do not disclose your Personal Information to organizations operating such linked third-party websites. We do not review or endorse, and are not responsible for, the privacy practices of these organizations. We encourage you to read the privacy policy of each and every website that you visit. This California Privacy Notice applies solely to information collected by the Company through the Services.

### **Children**

We respect the privacy of children. Our Services are not designed to attract an audience younger than thirteen (13), and we do not knowingly collect Personal Information from children under thirteen (13). If you are under the age of thirteen (13), you are not permitted to use our Services and should not send any information about yourself to us through the Services. Please contact us using the contact details below if you believe we may have collected information from your child under the age of thirteen (13), and we will work to delete it.

### **Changes to this California Privacy Notice**

We will update this Privacy Statement from time to time in response to changing legal, regulatory or operational requirements. We will provide notice of any such changes (including when they will take effect) in accordance with law. Your continued use of our services and products after any such updates take effect will constitute acknowledgement and (as applicable) acceptance of those changes. If you do not agree with our changes to the California Privacy Notice, your sole and exclusive remedy will be to discontinue use of the Services and this website.

For questions or concerns about the Company's privacy policies and practices, please contact us at [privacy@asgusa.net](mailto:privacy@asgusa.net).