

California Privacy Act Notice

1 About this Privacy Notice

Pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), the Kynetec & Kleffmann group of companies in scope of the CCPA (“we,” “us” or “our”) are providing this California Consumer Privacy Act Notice (“CCPA Notice”). This CCPA Notice supplements our [Privacy Policy](#) and applies solely to California consumers, effective January 1, 2020. Terms used but not defined shall have the meaning ascribed to them in the CCPA.

2 Personal Information Collected

We collect the following categories of personal information as indicated with a check mark below:

A.	Identifiers such as a real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address and account name.	√
B.	Personal information as defined in the California customer records law, such as name, contact information, education, employment, employment history and financial information.	√
C.	Characteristics of protected classifications under California or federal law.	√
D.	Commercial information, such as transaction information, purchase history, financial details and payment information.	√
E.	Biometric information, such as fingerprints and voiceprints.	
F.	Internet or other electronic network activity information, such as browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems and advertisements.	
G.	Geolocation data, such as device location.	√
H.	Audio, electronic, visual and similar information, such as images and audio, video or call recordings created in connection with our business activities.	√
I.	Professional or employment-related information, such as job title as well as work history and experience in presenter bios collected for events, presentations, marketing collateral and testimonials in connection with our business activities.	√
J.	Education information subject to the federal Family Educational Rights and Privacy Act, such as student records.	√
K.	Inferences drawn from any of the personal information listed above to create a profile or summary about, for example, an individual’s preferences and characteristics.	√

We collect this personal information from you and from other categories of sources such as: our affiliates; our customers; public and publicly available sources; data suppliers and service providers; partners with which we engage in marketing activities.

We share this personal information within our group of companies, our appointed agencies or representatives and other parties where required by law or to protect our rights.

We may use this personal information to conduct market research, analytics, and data analysis and to fulfill legal obligations.

3 Personal Information Disclosed

We disclose the following categories of personal information as indicated with a check mark below to our affiliates; our agents and representatives; and other parties where required by law or to protect our rights for our operational business purposes:

A.	Identifiers such as a real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address and account name.	√
B.	Personal information as defined in the California customer records law, such as name, contact information, education, employment, employment history and financial information.	√
C.	Characteristics of protected classifications under California or federal law.	√
D.	Commercial information, such as transaction information, purchase history, financial details and payment information.	√
E.	Biometric information, such as fingerprints and voiceprints.	
F.	Internet or other electronic network activity information, such as browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems and advertisements.	
G.	Geolocation data, such as device location.	√
H.	Audio, electronic, visual and similar information, such as images and audio, video or call recordings created in connection with our business activities.	√
I.	Professional or employment-related information, such as job title as well as work history and experience in presenter bios collected for events, presentations, marketing collateral and testimonials in connection with our business activities.	√
J.	Education information subject to the federal Family Educational Rights and Privacy Act, such as student records.	√
K.	Inferences drawn from any of the personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.	√

We not sell personal information to third parties within the scope of the application of the CCPA.

4 Consumer Rights

You have the right to request that we disclose to you (i) the categories of personal information we collected about you and the categories of sources from which we collected such information; (ii) the specific pieces of personal information we collected about you; (iii) the business or commercial purpose for collecting personal information about you; and (iv) the categories of personal information about you that we shared or disclosed and the categories of third parties with whom we shared or to whom we disclosed such information in the preceding 12 months. You also have the right to request that we delete personal information we collected from you subject to certain exceptions.

You also have the right to not be discriminated against in pricing and services because you exercise any of your rights under the CCPA. We do not offer financial incentives or price or service differences to consumers in exchange for the retention of a consumer's personal information.

5 How to make a request

You may make a request for the disclosures or deletion described above by calling the following toll-free number 800.753.6263 or by emailing your request to data.protection@kynetec.com or datenschutz@kleffmann.com

You may be required to submit proof of your identity for these requests to be processed as a verifiable consumer request. We may not be able to comply with your request if we are unable to confirm your identity or to connect the information you submit in your request with personal information in our possession. You may designate an authorized agent to make a request on your behalf subject to proof of identity and authorization.

We will respond to your request consistent with the CCPA, which does not apply to certain information, such as information made available from government records, and certain laws, and where its application is pre-empted by, or in conflict with, federal law of the United States or California Constitution.

6 Changes to this Privacy Notice

We will update this CCPA Notice from time to time. For this reason, we encourage you to review this privacy notice on an ongoing basis.

Last updated: 10th March 2020

Issued by: Data Protection Team

Contact:

Kynetec: data.protection@kynetec.com

Kleffmann: datenschutz@kleffmann.com