

RED DIAMOND, INC.

California Consumer Privacy Statement

Effective Date: January 1, 2020

Last Updated: July 1, 2020

This California Privacy Statement supplements the general [Privacy Policy](#) of Red Diamond, Inc. as well as any of its affiliates or subsidiaries (collectively “Red Diamond”), and provides notices, disclosures and descriptions of rights under: (a) the California Consumer Privacy Act (“CCPA”); (b) California’s “Shine the Light” law; and (c) the California Online Privacy Protection Act.

I. CCPA Privacy Notice

This CCPA portion of the California Privacy statement applies solely to California consumers (“you”) and addresses personal information we collect online and offline. This Statement does not apply to Red Diamond personnel or information collected about B2B personnel. Further, sections 2 and 3 of this privacy notice do not apply to job applicants.

Any terms in this statement undefined in this CCPA Privacy Statement or our General Privacy Policy have the meanings given to them in the California Consumer Privacy Act of 2018 and its implementing regulations, as they may be amended from time to time (the “CCPA”).

1. Notice of Collection and Use of Personal Information

We may collect the following categories of personal information about you:

- **Identifiers:** identifiers such as real name, alias, postal address, unique personal identifiers (such as a device identifiers; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifiers, internet protocol address (“IP address”), email address, account name, social security number, drivers’ license number, passport number, and other similar identifiers
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information, medical information, and health insurance information
- **Protected Classification:** characteristics of protected classification under California or federal law, such as race, color, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic, information, disability, citizenship status, and military and veteran status
- **Commercial Information:** commercial information, including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies

- **Online Activity:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements
- **Sensory Information:** audio, electric, visual and similar information
- **Employment Information:** professional or employment-related information
- **Education Information:** educational information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99)

We may use the categories of personal information listed above for the purposes described in our Privacy Notice. In addition, we may use these categories of personal information for certain business purposes specified in the CCPA, as described in this table:

Purposes	Categories of Personal Information
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, providing analytics services, or providing similar services.	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity • Sensory Information • Employment Information • Educational Information
Auditing related to a current interaction with you and concurrent transactions	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity • Sensory Information • Employment Information • Educational Information
Short-term, transient use	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity • Sensory Information • Employment Information • Educational Information

<p>Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity</p>	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity • Sensory Information • Employment Information • Educational Information
<p>Debugging to identify and repair errors that impair existing intended functionality</p>	<ul style="list-style-type: none"> • Identifiers • Online Activity • Sensory Information
<p>Undertaking internal research for technological development and demonstration</p>	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity • Sensory Information • Employment Information • Educational Information
<p>Undertaking activities to verify or maintain the quality of our services and to improve, upgrade, or enhance our services</p>	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity • Sensory Information • Employment Information • Educational Information
<p>Managing career opportunities with Red Diamond</p>	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity • Sensory Information • Employment Information • Educational Information

2. Our Prior Collection, Use and Disclosure of Personal Information

We may have collected and used your personal information, as described in Section 1 above, during the 12-month period prior to the effective date of this CCPA Privacy Statement. For the personal information collected during that timeframe, we describe below: (a) the categories of sources from which we may have obtained the personal information; (b) the categories of third parties with whom we may have shared the information, and (c) the categories of personal information we may have disclosed for a business purpose.

a. Sources of Personal Information

We may have obtained personal information about you from various sources as described below.

Categories of Sources of Data Collection	Categories of Personal Information
Directly from you, such as when you visit our Sites or register for an event we sponsor	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity • Sensory Information • Employment Information • Educational Information
From your devices, such as when you visit our Sites	<ul style="list-style-type: none"> • Identifiers • Online Activity
Your business colleagues, such as when they provide us with your contact information so we can send information that may interest you	<ul style="list-style-type: none"> • Identifiers • Protected Classifications • Sensory Information • Employment Information
Vendors who provide services on our behalf	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity • Sensory Information • Employment Information • Educational Information
Professional services organizations (such as auditors, PR firms, industry associations, etc.)	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity

	<ul style="list-style-type: none"> • Sensory Information • Employment Information • Educational Information
Social networks	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Online Activity • Employment Information
Government entities	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity • Sensory Information • Employment Information • Educational Information

b. Sharing of Personal Information

We may have shared your personal information with certain categories of third parties, as described below.

Vendors who provide services on our behalf	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity • Sensory Information • Employment Information • Educational Information
Professional services organizations (such as auditors, PR firms, industry associations, etc.)	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity

	<ul style="list-style-type: none"> • Sensory Information • Employment Information • Educational Information
Business partners (such as those with whom we may cohost events)	<ul style="list-style-type: none"> • Identifiers • Protected Classifications • Commercial Information • Employment Information
Government entities	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity • Sensory Information • Employment Information • Educational Information
Data analytics providers	<ul style="list-style-type: none"> • Identifiers • Additional Data Subject to Cal. Civ. Code § 1798.80 • Protected Classifications • Commercial Information • Online Activity • Sensory Information • Employment Information

We do not sell personal information and have not sold personal information during the 12-month period prior to the effective date of the Statement.

c. Disclosure of Personal Information for a Business Purpose

We may have disclosed to third parties for a business purpose the following categories of personal information:

- Identifiers
- Additional Data Subject to Cal. Civ. Code § 1798.80
- Protected Classifications
- Commercial Information
- Online Activity
- Sensory Information

- Employment Information
- Educational Information

3. California Consumer Privacy Rights.

You have certain choices and rights regarding your personal information, as described below.

Access: You have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected, used, disclosed, and sold about you during the past 12 months.

Deletion: You have the right to request that we delete certain personal information we have collected from you.

How to Submit a Request. To submit an access or deletion request, email us at privacy@reddiamond.com or call us at 800.292.4651.

Verifying Requests. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If you request access to or deletion of your personal information, we may require you to provide certain information, including: (a) name, (b) postal address, (c) email address and (d) telephone number. In addition, if you ask us to provide you with specific pieces of person information, we will require you to sign a declaration under penalty or perjury that you are the consumer whose personal information is the subject of the request.

Using an Authorized Agent. If you designate an authorized agent to make an access or deletion request on your behalf: (a) we may require you to provide the authorized agent written permission to do so, and (b) for access and deletion request, we may require you to verify your own identity directly with us.

Additional Information. If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request. This Statement is available in alternative formats upon request. Please contact privacy@reddiamond.com or call 800.292.4651 to request this Statement in an alternative format.

II. California’s Shine the Light Law

Separate from the CCPA, California’s “Shine the Light” law gives California residents the right to ask companies what personal information they share with third parties for those third parties’ direct marketing purposes. We do not disclose your personal information to third parties for the purpose of directly marketing their goods or services to you unless you request such disclosure. If you have any questions regarding this policy, you may contact us at privacy@reddiamond.com.

III. California Online Privacy Protection Act (“CalOPPA”)

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting Personally Identifiable Information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared.

According to CalOPPA, we agree to the following:

- Users can visit our site anonymously.
- We will add a link to our general privacy policy on our home page or as a minimum, on the first significant page after entering our website, as well as a link directly from that page to this notice.
- Our Privacy Policy link includes the word 'Privacy' and can easily be found on the page specified above.
- You can change your personal information by emailing us at privacy@reddiamond.com or calling us at 800.292.4651.