

IHI Group California Consumer Privacy Act Notice

The California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (the “CCPA”) requires IHI Group to disclose certain additional information to California residents. This notice provides such additional information applicable to visitors, users and others who reside in the State of California. Please note that the disclosure of such additional information does not apply to users in other geographies.

1. Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“Personal Information” as defined in the CCPA). In particular, we have collected the following categories of Personal Information within the last twelve (12) months. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of Personal Information not described below. We retain Personal Information we collect for as long as necessary to carry out the purposes for which we collected it, including for the purposes of satisfying any business, legal, accounting or reporting requirements to establish or defend legal claims, or for fraud prevention purposes.

Statutory Category of Personal Information	Personal Information Collected	Categories of third parties to whom we “disclosed” Personal Information for a business or commercial purpose
A. Identifiers.	A real name, alias, postal address, online identifier, Internet Protocol address, email address	Vendors and third parties who perform services on our behalf, Business and marketing partners, Affiliates
B. Personal information categories listed in the California Customer Records statute	A name, address, telephone number, age, and employment. Some personal information included in this category may overlap with other categories.	Vendors and third parties who perform services on our behalf, Business and marketing partners, Affiliates

(Cal. Civ. Code § 1798.80(e)).

D. Commercial Information

Records of purchases and travel history, as well as products or services considered, of customers and information of corporate customers' representatives.

Vendors and third parties who perform services on our behalf, Business and marketing partners, Affiliates

F. Internet or other similar network activity.

Browsing history, search history, or information on a consumer's interaction with a website.

Vendors and third parties who perform services on our behalf, Business and marketing partners, Affiliates

I. Professional or employment-related information.

Professional title and company name.

Vendors and third parties who perform services on our behalf, Business and marketing partners, Affiliates

J. Education information.

Education background.

Vendors and third parties who perform services on our behalf, Business and marketing partners, Affiliates

K. Inferences

Inferences drawn from information collected reflecting preferences, characteristics, psychological trends, predispositions, behavior,

Vendors and third parties who perform services on our behalf, Business and marketing partners, Affiliates

attitudes, intelligence, abilities,
and aptitudes.

2. How We Collect Information About You

We obtain the categories of Personal Information listed above either directly from you (e.g., from forms you complete) or indirectly from you (e.g., from observing your actions on our web site). We may also obtain information about you from third parties, such as our business partners such as marketing partners, publicly-available sources and data providers.

3. Use and Disclosure of Personal Information for Business Purposes

We may use the Personal Information we collect for any legitimate and lawful business purpose, including those listed in Section 2 (Use of Personal Information) of our Privacy Policy.

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for a business purpose:

Personal Information Category	Sold or Shared
Category A: Identifiers	Sold and Shared
Category B: California Customer Records personal information categories	Sold and Shared
Category D: Commercial Information	Sold and Shared
Category F: Internet or other similar network activity	Sold and Shared
Category I: Professional or employment-related information	Sold and Shared
Category J. Education information	Sold and Shared
Category K. Inferences	Sold and Shared

4. Sale or Sharing of Personal Information and Right to Opt-Out

While we do not sell personal information for money, like many companies, we may use services such as: Vendors and third parties who perform services on our behalf, Business and marketing partners, Affiliates] from providers who receipt of personal information may be

classified as “selling” or “sharing” your Personal Information with these providers. You can by submit requests to opt-out of such transfers [here](#) or via email to a2013008@ihi-g.com.

5. Sensitive personal information

We do not collect, use or disclose sensitive personal information for purposes that California residents have a right to limit under the CCPA.

6. Your Rights and Choices

The CCPA provides California residents with specific rights regarding their Personal Information. The following describes your CCPA rights and explains how to exercise those rights.

(1) Right to Know and Access to Specific Information

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past twelve (12) months; in other words, the “right to know.” Once we receive and confirm your verifiable consumer request (see Exercising Knowledge, Access, and Deletion Rights), subject to certain permitted exceptions, we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting or selling that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you (also called a data portability request).
- If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
 - sales, identifying the Personal Information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

You have a right to request a copy of the Personal Information that we have collected about you during the past 12 months.

(2) Right to Request Correction

You can ask us to correct inaccurate Personal Information that we have collected about you.

(3) Right to Opt-Out of the Sale or Sharing of Personal Information

See Section 4. “Sale or Sharing of Personal Information and Right to Opt-Out” for directions on how to exercise your right to opt-out of the sale or sharing of personal information.

(4) Right to Request Deletion

You have the right to request that IHI Group delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Knowledge, Access, and Deletion Rights), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

Without limitation, we may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which the Personal Information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated by you within the context of our ongoing business relationship with you, or otherwise perform a contract with you.
- Help to ensure security and integrity to the extent the use of the consumer’s Personal Information is reasonably necessary and proportionate for those purposes.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us and compatible with the context in which you provided the information.
- Comply with a legal obligation.

(5) Automated Decision Making and Profiling

We do not engage in automated decision making or profiling performed on personal information.

(6) Exercising Knowledge, Access, Correction and Deletion Rights

To exercise the knowledge, access, correction and deletion rights described above, please submit a verifiable consumer request to us by either:

Emailing us at a2013008@ihi-g.com; or Contacting us [here](#)

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. However, we may need to verify your authorized agent's identity and authority to act on your behalf. We may require a copy of a valid power of attorney given to your authorized agent pursuant to applicable law. If you have not provided your agent with such a power of attorney, we may ask you to take additional steps permitted by law to verify that your request is authorized, such as by providing your agent with written and signed permission to exercise your California privacy rights on your behalf, the information we request to verify your identity, and confirmation that you have given the authorized agent permission to submit the request. You may also make a verifiable consumer request on behalf of your minor child. You may only make a verifiable consumer request for knowledge or access twice within a twelve (12) month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

(7) Response Timing and Format

We endeavor to respond to a consumer request within applicable time limits. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the twelve (12) month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data access requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why

we made that decision and provide you with a cost estimate before completing your request.

(8) Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.