

# Privacy Notice for California Residents

**Last Revised:** 4/8/2021

This Privacy Notice for California Residents supplements the information contained in Lean Quests' general Privacy Policy and applies solely to all website visitors, users, clients, employees and other consumers who reside in the State of California. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice. This policy does not apply to Lean Quest's activities as a consumer reporting agency, whether through our website or otherwise.

## Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.

In particular, we may have collected through our websites, application or other business activities the following categories of personal information within the last twelve (12) months:

## **Category Examples Collected**

A. Identifiers. A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license or state identification number, passport number, or other similar identifiers.

B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

C. Protected classification characteristics under California or federal law. 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).

D. Commercial information. Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

E. Biometric information. Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

F. Internet or other similar network activity. Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

G. Geolocation data. Physical location or movements.

H. Sensory data. Audio, electronic, visual, thermal, olfactory, or similar information.

I. Professional or employment-related information. Current or past job history or performance evaluations.

J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

K. Inferences drawn from other personal information. Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you utilize.
- Indirectly from you. For example, from observing your actions on our website.
- Directly from third parties. For example, see our Client Data section of our [Privacy Policy](#).

Use of Personal Information

We do not sell your personal information. We may use, or disclose the personal information we collect for business purposes, including:

- Auditing consumer interactions and concurrent transactions
- Detecting security incidents and preventing fraud
- Debugging
- Short-term transient use, for example, contextual customization of ads
- Performing our services
- Advertising and marketing our services
- Performing analytics and quality control
- Researching and testing to improve our services

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

#### Sharing Personal Information

We may disclose your personal information to third party service providers for a business purpose described above. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

*Disclosures of Personal Information for a Business Purpose.* In the preceding twelve (12) months, Lean Quest has disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category D: Commercial information.
- Category F: Internet or other similar network activity.
- Category G: Geolocation data.
- Category H: Sensory data.
- Category I: Professional or employment-related information.
- Category J: Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))
- Category K: Inferences drawn from other personal information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service Providers.
- Government Entities
- Our Clients (in order to provide transportation logistics and management services)

### Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

*Access to Specific Information and Data Portability Rights.* 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 12 months, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), 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.
- Upon request, the specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list disclosing:
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

*Deletion Request Rights.* You have the right to request that we 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 Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the

context of our ongoing business relationship with you, or otherwise perform our contract with you.

2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. 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.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

*Exercising Access, Data Portability, and Deletion Rights.* To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us [here](#).

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

#### Non-Discrimination

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

- Deny you services.
- Charge you different prices or rates for services.
- Provide you a different level or quality of services.

#### Other California Privacy Rights

California Civil Code Section § 1798.83 permits website users that are California residents to request certain information regarding the disclosure of personal data to third parties for direct marketing purposes. To make such a request, please visit our request page [here](#).

### Changes to Our Privacy Notice

For any changes we make to this notice, including making material changes to how we treat our users' personal data, we will post a notice of such changes on our website home page. The date this notice was last revised is identified at the top of the page. Please be aware, you are responsible for inspecting our website to make yourself up-to-date with our privacy policy and this notice.

### Contact Information

If you have any questions or comments about this notice, the ways in which Lean Quest collects and uses your information as described in this notice, your choices and rights regarding such use, or wish to exercise your rights under California law, please click [here](#).