

July 1, 2021

These Additional California Privacy Disclosures (the “**CA Disclosures**”) supplement the information contained in our Privacy Policy and apply solely to individual residents of the State of California (“**consumers**” or “**you**”).

These CA Disclosures provide additional information about how we collect, use, disclose and otherwise process personal information of individual residents of the State of California, either online or offline, within the scope of the California Consumer Privacy Act of 2018 (“**CCPA**”). Unless otherwise expressly stated, all terms in these CA Disclosures have the same meaning as defined in our Privacy Policy or as otherwise defined in the CCPA.

Personal Information Disclosures

When we use the term “personal information” in these CA Disclosures, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

For the purposes of these CA Disclosures, personal information does not include:

- Publicly available information from government records.
- Deidentified, aggregated or anonymized data (not capable of being associated with or linked to you).
- Information relating to our job applicants, employees, contractors and other personnel of Simply Innovative Consulting LLC, which is not governed by these CA Disclosures.
- Certain information that we process solely on behalf of our Clients as a “service provider,” which includes information relating to Respondents that fill out assessments created by our Clients.
- Information excluded from the CCPA’s scope, such as: (i) Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; (ii) Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

Collection and Use of Personal Information

We collect various categories of personal information in connection with our services. Please review our Privacy Policy to learn more about the personal information we collect. The business purpose for the information collected is as follows:

- (i) To provide you with and manage access to our products and services, audit the transactions in our platform and manage the relationship with our users;
- (ii) To communicate with you, including via email, push notification and/or social media;
- (iii) To operate, evaluate, secure and improve our business;
- (iv) To enhance our services
- (v) To recognize you and remember your information when you return to our website and services;
- (vi) To develop and carry out marketing campaigns and activities;
- (vii) For debugging existing intended functionality;
- (viii) For testing, training, research, analysis and product development, including to develop and improve our products and services;
- (ix) To detect and protect against security events;
- (x) To defend, protect or enforce our rights or applicable terms of service;
- (xi) To comply with legal process and our legal obligations; and
- (xii) As otherwise provided in our agreements with you.

Disclosure of Personal Information

We have not sold personal information about you, but we have disclosed all of the categories of personal information we collect, explained in the table above, to our affiliate and to third parties for a business purpose.

Note about “Sales”: We do not “sell” personal information as most people would typically understand that term. However, we do allow certain third-party partners and providers to collect information about consumers directly through our services for purposes of analyzing and optimizing our services and ads, providing content and ads that are more relevant, measuring statistics and the success of ad campaigns, and detecting and reporting fraud. To the extent this practice is interpreted to constitute a “sale” under the CCPA, please see our cookie policy for more information including how you may be able to exercise your rights to opt-out of cookies, analytics and personalized advertising.

Recipients of Personal Information

As described in our Privacy Policy, we share personal information with a variety of third parties for business purposes. Please refer to our Privacy Policy for further information.

Your California Privacy Rights

As a California resident, you may be able to exercise the following rights in relation to the Personal Information about you that we have collected (subject to certain limitations at law and the applicability of law to Simply Innovative Consulting LLC):

The Right to Know

You have the right to request any or all of the following information relating to the personal information we have collected about you or disclosed in the last 12 months, upon verification of your identity:

- The specific pieces of personal information we have collected about you;
- The categories of personal information we have collected about you;
- The categories of sources of the personal information we have collected about you;
- The categories of personal information that we have disclosed about you to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;
- The categories of personal information we have sold about you (if any), and the categories of third parties to whom this information was sold; and
- The business or commercial purposes for collecting or selling personal information about you.

The Right to Request Deletion

You have the right to request the deletion of personal information that we have collected from you, subject to certain exceptions.

The Right to Opt Out of Personal Information Sales

You have the right to direct us not to sell personal information we have collected about you to third parties now or in the future. If you are under the age of 16, you have the right to opt in, or to have a parent or guardian opt in on your behalf, to such sales.

The Right to Non-Discrimination

You have the right not to receive discriminatory treatment for exercising any of the rights described above. However, please note that if the exercise of the rights described above limits our ability to process personal information (such as in the case of a deletion request), we may no longer be able to provide you our products or services or engage with you in the same manner.

How to Exercise Your California Privacy Rights

To Exercise Your Right to Know or Right to Deletion

To inquire about your rights and to exercise your right to know and/or right to deletion, please submit a request by emailing hello@simplyinnovativeconsulting.com.

We will need to verify your identity and the applicability of the CCPA to your request before processing your request. In order to verify your identity, we will generally either require the successful login to your account or the matching of sufficient information you provide us to the information we maintain about you in our systems. Although we try to limit the personal information collected in connection with a request to exercise the right to know and/or the right to delete that personal information, certain requests may require us to obtain additional personal information from you. In certain circumstances, we may decline a request to exercise the right to know and/or right to deletion, particularly where we are unable to verify your identity.

To Exercise Your Right to Opt Out of Personal Information Sales

As noted above, we do not “sell” personal information as most people would typically understand that term. However, we do allow certain third-party partners and providers to collect information about consumers directly through our services for purposes of analyzing and optimizing our services and ads, providing content and ads that are more relevant, measuring statistics and the success of ad campaigns, and detecting and reporting fraud. To the extent this practice is interpreted to constitute a “sale” under the CCPA, please see our cookie policy for more information.

Updates to These CA Disclosures

We may update these CA Disclosures from time to time. When we make changes to these CA Disclosures, we will change the “Last Updated” date at the beginning of these CA Disclosures. All changes shall be effective from the date of publication unless otherwise provided in the notification.