



CALIFORNIA PRIVACY RIGHTS STATEMENT

Last updated: January 1st, 2021

This California Privacy Rights Statement (this "Statement") explains how Telaworks, Inc. and our subsidiaries, affiliates and parent companies ("Telaworks," "we," "us," or "our") collect, use, and share Personal Information of California residents in our capacity as a "business" under the California Consumer Privacy Act of 2018 (CCPA). This Statement also explains California residents' rights under the CCPA and California Civil Code section 1798.83 (the "Shine the Light law").

Scope:

For purposes of this Statement, unless a different definition is noted, "Personal Information" has the definition given in the CCPA. However, this Statement does not apply to:

Information exempted from the scope of the CCPA; Personal Information we collect from individuals acting in their capacities as representatives of organizations solely in the context of conducting due diligence regarding, or providing or receiving a product or service to or from, such organizations; or Personal Information we collect, use, and share on behalf of our customers as a "service provider" under the CCPA for purposes of providing our services to them.

California Privacy Rights under the CCPA:

You can request the following information about how we have collected and used your Personal Information during the past 12 months:

The categories of Personal Information we have collected.

The categories of sources from which we collected the Personal Information.

The business or commercial purpose for collecting and/or selling Personal Information.

The categories of third parties with whom we share the Personal Information.

The categories of Personal Information that we sold or disclosed for a business purpose.

The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.

Access:

You can request a copy of the Personal Information that we have collected about you during the past 12 months. You can ask us to delete the Personal Information that we have collected from you. You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

How to Exercise Your Rights:

You may submit requests to exercise your California privacy rights described above as follows:

Right to information, access, and deletion:

If you are a California resident, you may submit a request to exercise your information, access, and deletion rights by emailing info@telaworks.com.

Right to opt-out of the “sale” of your personal information:

We do not sell your personal information in the conventional sense. However, like many companies, we use advertising services that try to tailor online ads to your interests based on information collected via cookies and similar technologies about your online activity. This is called interest-based advertising. The CCPA’s statutory definition of the term “sale” is broad and may include interest-based advertising. You can get more information and opt-out of the use of cookies on our sites for interest-based advertising purposes by clicking the Do Not Sell My Personal Information link on our homepage and setting your preferences. You will need to set your preferences from each device and each web browser from which you wish to opt-out. This feature uses a cookie to remember your preference, so if you clear all cookies from your browser, you will need to re-set your settings.

These rights are not absolute, and in some instances, we may decline your request as permitted by law. We will need to verify your identity to process your information, access, and deletion requests and reserve the right to confirm your California residency. To verify your identity, we may require you to log into your Telaworks account (if applicable), provide government identification, give a declaration as to your identity under penalty of perjury, and/or provide additional information.

Your authorized agent may make a request on your behalf upon our verification of the agent's identity and our receipt of a copy of the valid power of attorney given to your authorized agent pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent with written and signed permission to exercise your CCPA rights on your behalf, provide the information we request to verify your identity and provide us with written confirmation that you have given the authorized agent permission to submit the request.

Our Personal Information Collection and Use Practices:

The categories of Personal Information we collect are described below by reference to the statutory categories of Personal Information specified in the CCPA (California Civil Code section 1798.140):

Identifiers, such as name, email address, postal address, username, password, IP address, and other online identifiers. Sensory information, such as call and video recordings and profile photos. California customer records (as defined in California Civil Code § 1798.80), such as contact details and communications we collect through our support channels, marketing webpages, social media, at our events, and connected with our other marketing activities. Commercial information, such as billing and transaction information and purchase history. Internet or network activity information, such as information generated from interactions with our online services, such as data collected through server logs and cookies and similar technologies. Geolocation, such as your city or other general location. Professional or employment-related information, such as current or prior organizational affiliation, job title, information about your role, and work-related contact details. Education information, such as student records and directory information. Inferences that we derive from the preceding or other information we collect. Information you voluntarily provide to us, such as in free-form web forms, may contain other categories of personal information not described above.

Sources:

Internet/network activity information, geolocation, IP address, and other online identifiers are collected automatically through your use of our online services. We may collect some professional information and California customer records information from our affiliates, third party data providers, or publicly available sources. We collect education information from schools that use our services. Please see our K-12/Primary and Secondary Privacy Statement for more information. Otherwise, we collect the information above from you.

Disclosures to third parties for business purposes:

We describe the categories of third parties to whom we disclose Personal Information described above for business purposes in the section of our Privacy Statement entitled How We Share Personal Data.

Business/commercial purposes for use:

We describe the business and commercial purposes for which we use the Personal Information described above in the section of our Privacy Statement entitled Data We Process & How We Use It.

This section describes our practices currently and during the 12 months preceding the 'Last Updated' date of this Statement.

California Shine the Light Law:

Under California's Shine the Light law, you may also ask companies with whom you have formed a business relationship primarily for personal, family or household purposes to provide the names of third parties to which they have disclosed certain personal information (as defined under the Shine the Light law) during the preceding calendar year for their own direct marketing purposes and the categories of personal information disclosed. You may send us requests for this information to info@telaworks.com. In your request, you must include the statement "Shine the Light Request," and provide your first and last name and mailing address and certify that you are a California resident. We reserve the right to require additional information to confirm your identity and California residency. Please note that we will not accept requests via telephone, mail, or facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.