

California Privacy Notice

This CALIFORNIA PRIVACY NOTICE (“**Notice**”) IS FOR CALIFORNIA RESIDENTS and supplements our Privacy Policy.

We have adopted this Notice to comply with the *California Consumer Privacy Act of 2018* (“**CCPA**”).

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 device (“**personal information**”). In particular, we collect:

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 number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Including but not limited to 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.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), national origin, citizenship, marital status, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information)	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES

E. Biometric information.	An individual's physiological, biological or behavioral characteristics that can be used singly or in combination with each other or with other identifying data, to establish individual identity. Facial recognition technology collects information from your image capture, including biometric data, and shares this information with us, which assists us to verify your ID.	YES
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Audio or video data	Audio, electronic, visual, thermal, olfactory, or similar information,	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
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.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, predispositions, behavior,	YES

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

- Directly from our Users. For example, from when Users register for our services.
- Directly and indirectly from activity on our websites and applications. This includes:
 - Usage and log information. For example, service-related, diagnostic and performance information. This includes information about your activity on our websites and applications, log files and reports.
 - Device and connection information. We collect device-specific information such as hardware model, operating system information, browser information, IP address etc.

- From third parties that interact with us in connection with the services we perform. We may work with third parties, for example, in order to understand, customize, support and market the services we provide and/or to comply with laws.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes as disclosed in our Privacy Policy:

- To provide and manage the services you request
- To improve customers service and our services
- To process payments
- To personalise user experience
- To contact you about our services
- To send important notices to you
- To comply with our legal and regulatory obligations
- To offer alternative dispute resolution 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 a third party for a business purpose. 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 for performing the contract.

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

- Our affiliates.
- Service providers.
- Third parties that interact with us in connection with the services we perform.

We do not sell your personal information, and never will.

Your Rights and Choices

The CCPA provides Users who are California residents with specific rights regarding their personal information. You have the right to access the personal information we've collected about you during the past 12 months and information about our data practice. You also have the right to request that we delete the personal information we have collected from you.

Exercising Access and Deletion Rights

To exercise the access and deletion rights described above, please submit a verifiable consumer request to us by visiting dataprivacy@vgw.co.

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. If you decide to use an authorized agent, please also include written permission that you have designated that agent to make this request, or proof of the agent's power of attorney. We may follow up with you to verify your identity before processing your authorized agent's request. You may also make a verifiable consumer request on behalf of your minor child.

In order for your consumer request to be verifiable, you must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. You will need to provide:
 - full name
 - date of birth
 - address
 - email address
 - whether you are a California consumer pursuant to CCPA
 - (if you would like to know the specific pieces of personal information that we have collected about you, or to delete your personal information) identification that clearly shows your name, date of birth and address (for example, passport or other photo identification)
- 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.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 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 portability 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.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights.

Changes to this Notice

This Notice may be updated from time to time to reflect changes in the way we work or the way our work is regulated. We will notify you of changes by posting changes here, or by other appropriate means.

Contact Information

If you have any questions or comments about this Notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under CCPA, please do not hesitate to contact us at:

Email: dataprivacy@vgw.co
Attn: Data Protection Officer