

## California Consumer Protection Act Privacy Notice

Last modified: January 29, 2021

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS (“**Privacy Notice**”) supplements the information contained in Internetnetwork Services Incorporated d/b/a Internetnetwork Engineering’s (“**Company**”, “**We**”, “**Our**” or “**Us**”) Privacy Policy (the “**Policy**”) located at <https://www.ineteng.com/privacy> and applies solely to visitors, users, and others who reside in the State of California (for the purposes of this Privacy Notice, “**Consumer**”, “**User**” “**You**” or “**Your**”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this Privacy Notice.

Where noted in this Policy, the CCPA temporarily exempts Personal Information as defined in the Information We Collect below, reflecting a written or verbal business-to-business communication (“**B2B Personal Information**”) from some its requirements.

### Information We Collect

We may 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 (as used in this Privacy Notice, “**Personal Information**”). In particular, We have collected the following categories of Personal Information from Consumers within the last twelve (12) months:

- Category A – Identifiers
  - Examples: Name, postal address, Internet Protocol address, email address, Social Security number, driver’s license number, passport number, or other similar identifiers.
- Category B – Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
  - Examples: Name, signature, Social Security number, address, telephone number, fax number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, bank account number, credit card number, debit card number, or any other financial information, physical illness, mental illness or disabilities.
- Category C – Protected classification characteristics under California or federal law
  - Examples: Age, ethnicity, citizenship, religion or creed, marital status, physical illness, mental illness or disabilities, gender, veteran status.
- Category D – Commercial information
  - Examples: Records of personal property.
- Category E – Biometric information
  - Examples: Genetic, physiological, behavioral, and biological characteristics.
- Category F – Internet or other similar network activity
  - Examples: Access history and information on Your interaction with Our application.

- Category I – Professional or employment-related information
  - Examples: Occupation, employer information.
- Category K – Inferences drawn from other Personal Information.
  - Profile reflecting a person’s preferences, characteristics, or psychological information.

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from You. For example, through information We ask from You when You download, register with, or use the Site.
- Directly and indirectly from You when using the Site. For example, usage details collected automatically in the course of Your interaction with the Site.

#### *Use of Personal Information*

We may use or disclose the Personal Information We collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided.
- To create, maintain, customize, and secure Your account with Us.
- To provide You with email alerts and other notices concerning the Site.
- To provide, support, personalize, and develop this Site, products, and services.
- To improve Our services to You.
- To process Your requests, purchases, transactions, and payments and prevent transaction fraud.
- To provide You with support and to respond to Your inquiries, including to investigate and address Your concerns and monitor and improve Our responses.
- For testing, research, analysis and product or service development.
- As necessary or appropriate to protect the rights, property or safety of Us, Users or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to You when collecting Your Personal Information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Us is among the assets transferred.

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 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.

In the preceding twelve (12) months, We have disclosed Personal Information for a business purpose. In addition, in the preceding twelve (12) months, We have not sold any Personal Information.

We do not sell Your Personal Information.

### 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. Once We receive and confirm Your verifiable Consumer request, We will disclose to You:

- The categories of Personal Information We collected about You.
- Our business or commercial purpose for collecting 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).

#### *Deletion Request Rights*

You have the right to request that We delete any of Your Personal Information We collected from You and retained, subject to certain exceptions. Once We receive and confirm Your verifiable Consumer request, 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 providers to:

- 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.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- 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.
- Comply with a legal obligation.
- 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 by email at [Compliance@ineteng.com](mailto:Compliance@ineteng.com).

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. 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. 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.

We do not provide a right to access, data portability, or deletion rights for B2B Personal Information.

#### *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 the registered email associated with the 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. Unless permitted by the CCPA, We will not:

- Deny You use of this Site.
- Provide You a different level or quality of service when using the Site.
- 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.

However, We may offer You certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive We offer will reasonably relate to Your Personal Information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires Your prior opt-in consent, which You may revoke at any time.

#### Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits Users that are California residents to request certain information regarding Our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to [Compliance@ineteng.com](mailto:Compliance@ineteng.com).

#### Changes to Our Privacy Notice

We reserve the right to amend this Privacy Notice at Our discretion and at any time. The date this Privacy Notice was last updated is identified at the bottom of this page. You are responsible for periodically visiting this Privacy Notice to check for any changes.

#### Contact Information

If You have any questions or comments about this Privacy Notice, Our 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 California law, You may contact Us via email at [Compliance@ineteng.com](mailto:Compliance@ineteng.com). If You need to access this Privacy Notice in an alternative format due to a disability, please contact Us via at [Compliance@ineteng.com](mailto:Compliance@ineteng.com).