

CYBER SUPPLEMENTARY PRIVACY NOTICE FOR RESIDENTS OF CALIFORNIA

Effective Date: February 27, 2019

Last Updated on: September 25, 2024

This **Supplementary Privacy Notice** (the “**California Notice**”) supplements the information contained in CP Cyber Privacy Policy (<https://cpcyber.com/wp-content/uploads/CP-Cyber-Privacy-Policy.pdf>) and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you") who visit or use www.cpcyber.com (the “**Website**”) or any associated applications or services. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA) and any other amendments thereto. Any capitalized but undefined terms in this Policy have the meanings set forth in the CPRA or the Privacy Notice, as applicable. References to the CCPA shall be understood as references to the CPRA. References to the Website shall be understood as references to all services provided by Us.

Where noted in this Policy, the CCPA temporarily exempts personal information reflecting a written or verbal business-to-business communication (“**B2B personal information**”) from some of its requirements. Capitalized but undefined terms in this California Notice have the meanings set forth in the Privacy Notice. If the terms of this California Notice and the terms of the Privacy Notice are in conflict, the terms of this California Notice shall govern.

Information We Collect

We may 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.
- Deidentified or aggregated consumer information.
- Information that is subject to specialized privacy laws (“**special information**”), including personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We will undertake our best efforts to also comply with the collection and disclosure restrictions that affect any special information.

In the last twelve (12) months we have collected the following categories of personal information from consumers:

Category	Examples	Collected	Retention Length
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	Until no longer needed to perform services.
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.	YES	Until no longer needed to perform services.
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).	NO	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other	YES	Until no longer needed to perform services.

	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.	NO	
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	Until no longer needed to perform services.
G. Geolocation data.	Physical location or movements.	YES	Until no longer needed to perform services.
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO	
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES	Two years following collection
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, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO	

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 through our provision of services to you.

- Indirectly from you. For example, from observing your actions on our Website and Application.

Use of Personal Information

We may use, sell or share, or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- To provide, support, personalize, and develop our Website, Content, products, and services.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our Services, products and services, databases and other technology assets, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- For any other legitimate business purpose consistent with applicable law and Our Privacy Notice.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA, CPRA, or any other applicable law or regulation.
- 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 about our Website users 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 and the opportunity to opt-out of such collection.

Sharing Personal Information

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing their obligations under such written contracts. In the preceding twelve (12) months, Company has disclosed personal information for a business purpose to the categories of third parties indicated in the chart below.

For more on your rights regarding the disposition of your personal information, see Personal Information Sales Opt-Out and Opt-In Rights.

Personal Information Category	Category of Third-Party Recipients
	Business Purpose Disclosures
A: Identifiers.	To provide our services, create datasets, and optimize our content and for employment-related purposes.
B: California Customer Records personal information categories.	To provide our services, create datasets, and optimize our content.
C: Protected classification characteristics under California or federal law.	For employment-related purposes
D: Commercial information.	To provide our services, create datasets, and optimize our content.
E: Biometric information.	None
F: Internet or other similar network activity.	To provide our services, create datasets, and optimize our content.
G: Geolocation data.	To provide our services, create datasets, and optimize our content.
H: Sensory data.	None
I: Professional or employment-related information.	For employment-related purposes.
J: Non-public education information.	None
K: Inferences drawn from other personal information.	None

Resell or sharing Personal Information

The CCPA prohibits a third party from reselling or sharing personal information unless you have received explicit notice and an opportunity to opt-out of further sales. We do not sell or resell your personal information for any purposes whatsoever.

Sensitive Information

We do not currently collect what would be considered “Sensitive Personal Information” under the CPRA from normal business uses of our Website or Content.

However, we may collect certain information that is considered “Sensitive Personal Information” under the CPRA from potential employees and contractors. Such Sensitive Personal Information includes, but is not limited to:

- Social Security numbers, state identification numbers, driver’s licenses, and similar identifiers.
- Account log-in, financial account, debit card, or credit card numbers, along with any required security or access code, password, or credentials that allow access to such accounts.

When we collect your Sensitive Personal Information we will always (i) let you know why it was collected, and what purposes it will be used for, and (ii) provide you with an opportunity, both before and after collection of such data, to opt-out of the collection or use of your Sensitive Personal Information. Please be aware that some of our services require the use of your Sensitive Personal Information in order to function.

To exercise these opt out rights, please:

- Set your browser extension settings to opt-out of the collection of sensitive personal information;
- Contact us at Privacy@CPcyber.com requesting to opt out of the collection, sale, or sharing of sensitive personal information;
- Check the box stating “please do not collect my sensitive personal information” before starting to use any of our services that collect such information; or
- Follow the directions contained on the DO NOT SELL OR SHARE MY PERSONAL INFORMATION LINK located at the bottom of the homepage of each of our Sites.

Your Rights and Choices

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

Right to Know and Data Portability

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 (the "right to know"). We may also provide information from beyond 12 months if it is not unduly burdensome for us to collect. Once we receive your request and confirm your identity (see Exercising Your Rights to Know or Delete), 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 sell or sharing that personal information.
- The categories of third parties with whom we share that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

Right to Delete

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 (the "right to delete"). Once we receive your request and confirm your identity (see Exercising Your Rights to Know or Delete), we will review your request to see if an exception allowing us to retain the information 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, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, 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 *et. 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.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers, contractors, and any other entities with whom such information has been shared to take similar action.

Right to Opt out of Certain Automated Decision-making and Profiling.

Our Sites make use of certain automated decision-making algorithms which help to optimize how we provide our services to you by curating your user experience. You may choose not to have your personal information included in or subject to such automated decision-making and profiling. You also have the right to request information about:

- The types of profiling that we use;
- The algorithms and assumptions underlying our automated decision-making;
- The likely outcomes of our automated decision-making processes as directed to you, the individual requesting such information.

You may exercise these rights by contacting us at Privacy@CPcyber.com or 1512 Larimer St. #150, Denver, CO 80202, or by following the directions contained on the DO NOT USE AUTOMATED DECISIONMAKING OR PROFILING link on the bottom of the homepage of each of Sites

Right to Correct

You have the right to request that we correct any inaccurate personal information about you, taking into account the nature of the personal information and of our use of such personal information. Upon receiving a request to correct inaccuracies from a verified person, we shall endeavor to correct the incorrect information as soon as is feasible unless an exception to our obligation to do so applies.

Exercising Your Rights

To exercise your rights to know or delete described above, please submit a request by either:

- Emailing us at Privacy@CPcyber.com
- Contacting us at 1512 Larimer St. # 150, Denver, CO 80202
- Calling us at 720-541-8910

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information. To designate an authorized agent, please provide a letter, signed by you and your authorized agent designating your authorized agent.

You may also make a request to know or delete on behalf of your child by contacting us through one of the above means.

You may only submit a request to know twice within a 12-month period. Your request to know or delete must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, and we reserve the right to request verification requirements.
- 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.

You do not need to create an account with us to submit a request to know or delete. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

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

For instructions on exercising your sale opt-out or opt-in rights, see Personal Information Sales Opt-Out and Opt-In Rights.

Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact us at Privacy@CPcyber.com or 1512 Larimer St. # 150, Denver, CO 80202.

We endeavor to substantively respond to a verifiable consumer request without undue delay and in any case within thirty (30) days of its receipt. If we require more time (up to another 30 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, in the same format as the request you sent to us.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. 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.

Personal Information Sales Opt-Out and Opt-In Rights

If you are age 16 or older, you have the right to direct us to not sell or share your personal information at any time (the "right to opt-out"). We do not sell consumer personal information at this time, and we do not collect information from individuals we actually know are less than 16 years old. To exercise the right to opt-out, you (or your authorized representative) may submit a request to us at Privacy@CPcyber.com.

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA or CPR rights. Unless permitted by the CCPA or CPRA, we will not:

- Deny you services.
- Charge you different prices or rates for services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of services.

CCPA Rights Request Metrics

Reserved.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website 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 Privacy@CPcyber.com or write to us at 1512 Larimer St. #150, Denver, CO 80202.

Changes to Our Privacy Notice

We reserve the right to amend our privacy policy and this California Notice at our discretion and at any time. When we make changes to the privacy policy or this California Notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

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

Phone: 720-541-8910

Website: www.cpcyber.com

Email: Privacy@CPcyber.com

Postal Address: 1512 Larimer St. #150, Denver, CO 80202

If you need to access this Policy in an alternative format due to having a disability, please contact us at Privacy@CPcyber.com.

