

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS UNDER THE CALIFORNIA CONSUMER PRIVACY ACT

(A) INTRODUCTION

This **CCPA Privacy Notice** governs the manner in which Ongage processes information collected from consumers who reside in the State of California (“**Consumers**” as defined under the California Consumer Privacy Act of 2018 (“**CCPA**”), and will be referred herein as “**you**”). Any terms defined in the CCPA have the same meaning when used in this Privacy Notice. Further, this Privacy Notice is an integral part of our Privacy Policy and thus, definitions used herein but not defined herein shall have the meaning ascribed to them in our [Privacy Policy](#).

To learn more about your California privacy rights, please visit <https://oag.ca.gov/privacy/privacy-laws>.

(B) CATEGORIES OF PERSONAL INFORMATION

When you use the Site and Services, we collect certain data regarding such use. This data includes “**Personal Information**” that is defined under the CCPA as any 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, household or device as detailed in the table below.

Please see below a table detailing the categories of Personal Information that we collect (and has collected within the last 12 months):

Category	Examples of Personal Information	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.	Collected
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.	Not Collected
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	Not Collected

	genetic information).	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Not Collected
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.	Not Collected
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Collected
G. Geolocation data.	Physical location or movements.	Not Collected
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	Not Collected
I. Professional or employment-related information.	Current or past job history or performance evaluations.	Not Collected
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.	Not Collected
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Not Collected

(C) DISCLOSURES OF PERSONAL INFORMATION FOR A BUSINESS PURPOSE

In the preceding twelve (12) months, the Company has disclosed the following categories of Personal Information for a business purpose:

Category A: Identifiers;

Category F: Internet or other similar network activity;

We disclose your Personal Information for a business purpose to the following categories of third parties: service providers & data aggregators (e.g. for analytics purposes), business partners (for fraud detection and payment calculation, our Customers for providing them with the Services).

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.

(D) HOW WE COLLECT INFORMATION

We collect the above data from you, in the following ways:

- (i) In the event you voluntarily choose to provide us with information, e.g., when you contact us.
- (ii) Automatically when you are using our Services embedded in our Customer's websites, including through the use of cookies (as detailed in our [Privacy Policy](#)), and other similar tracking technologies.

We will ask for your consent to collect Personal Information and offer you the choice to opt-out of such collection if we are required to do so in accordance with applicable law.

(E) 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 you provided the information. For example, if you contact us with an inquiry and share your name and contact information, we will use that Personal Information to respond to your inquiry.
- To improve our Services.
- For security and fraud detection purposes, and to maintain the safety, security, and integrity of our Services.
- 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 Privacy Policy

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.

(F) SALE OF PERSONAL INFORMATION

In the preceding twelve (12) months, we have not sold Personal Information.

(G) USERS' RIGHTS & CONTROLS

The CCPA provides consumers with specific rights regarding their Personal Information. Please review our [Privacy Rights Policy](#) regarding your rights under applicable law.

We provide you with the ability to exercise certain choices and controls in connection with our treatment of your Personal Information, depending on your relationship with us. You may exercise any or all of your above rights in relation to your Personal Information by filling out the Data Subject Request form available [here](#) and send it to our privacy team at: dpo@ongage.com.

(H) AMENDMENTS

As required under the CCPA, we will **update** this Privacy Notice **every 12 months**. The last revision date will be reflected in the “Last Modified” heading located at the bottom of the Privacy Notice.

Last updated: September 2020