

PRIVACY NOTICE AND DISCLOSURE FOR CALIFORNIA RESIDENTS

Effective Date: January 1, 2020.

Last Revised on: January 1, 2020.

Last Reviewed on: January 1, 2020.

Daxko, LLC and its subsidiaries, affiliates or parent entities (“we”, “our,” “Daxko,” or “Company”) respect your privacy and are committed to providing a transparent notice of our Privacy Notice and Disclosure for California Residents. This Privacy Notice and Disclosure for California Residents applies solely to those who reside in the State of California (“consumers” or “you”).

The purpose of this privacy notice and disclosure is to inform California residents, at or before the time we collect your personal information, how we use your personal information and what your rights are with respect to your personal information:

- Your “Right to Know” about personal information collected, used, and disclosed including:
 - What categories of personal information we collect from you and the purpose for its collection,
 - How we use those categories personal information,
 - How we share the personal information you entrust to us,
- Transparency about personal information that we sell [*or our commitment not to sell your data now or in the future*], [and your right to opt-out of the sale of your personal information].
- Your “Right to Delete” personal information
- How to submit a verified consumer request for your Right to Know or Right to Delete
- How to use an authorized agent to submit a verified consumer request
- Your “Right to Non-Discrimination” for the exercise of a privacy right
- Other California privacy rights
- Changes to our privacy notice
- Our contact information:
 - legal@daxko.com
 - <https://www.daxko.com/privacy>

Your Right to Know

You have the right to request that Company disclose what personal information it collects, uses, discloses, and sells. You can do this through a verified consumer request. That process is described below in the section, “**Submitting a Verified Consumer Request.**”

We collect personal information, which means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). The following table includes disclosures of the personal information we collect from consumers and the purposes for which it

is collected and used, as well as lists of categories of consumers' personal information we have collected about consumers in the past 12 months, the categories of sources from which it was collected and categories of third parties with whom we share the personal information.

What personal information do we collect, use and share?		
We Collect/Use	<input checked="" type="checkbox"/>	A. Identifiers: For example, 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
We Have Collected/Used in the Past 12 Months	<input checked="" type="checkbox"/>	
This category of personal information is collected and used for the following purposes:	What are the categories of sources from which the personal information was collected?	This category of personal information has been disclosed in the preceding 12 months to the following third parties for a business purpose:
<ul style="list-style-type: none"> • To fulfill or meet the reason for which the information is provided • For our internal operation purposes • For auditing relating to consumer transactions including ad impressions and compliance with regulations • Fraud and security detection • Debugging to identify and repair errors • Short-term data use for the current interaction that is not used to build a profile • Servicing transactions and accounts (e.g., customer service, maintaining and servicing accounts, customer verification, payment processing) and providing services on behalf of business or service provider (e.g., financing, advertising or marketing, analytics) • 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 a bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred. • Undertaking internal research for technological development and demonstration 	<ul style="list-style-type: none"> • Information from you that you actively provide: We collect this information from sources including from online forms, e-mail, and via telephone. • Information from you that you provide passively from your use of your sites and services: We collect this information from sources including from a web browser, e-mail, app, or smartphone. • Third Parties (information we collect about you from third party sources): We collect this from sources including [partners, lead generators, CRAs, and Consumer Data Resellers] 	<ul style="list-style-type: none"> • Cloud storage providers • Payment processors • Web analytics providers • Web hosting service providers • Help Desk service providers • Financial and accounting service providers • Cybersecurity service providers • Logistics and planning tool providers

<ul style="list-style-type: none"> To share the personal information with service providers to carry out other business purposes. 			
We Collect/Use	<input checked="" type="checkbox"/>	F. Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement	
We Have Collected/Used in the Past 12 Months	<input checked="" type="checkbox"/>		
This category of personal information is collected and used for the following purposes:	What are the categories of sources from which the personal information was collected?	This category of personal information has been disclosed in the preceding 12 months to the following third parties for a business purpose:	
We utilize Google Ads for our marketing, In this context, Google is the entity collecting browsing history through cookies on our website). Daxko does not independently store browser data.	Browsing History.	No, other than through the provider, Google	
We Collect/Use	<input checked="" type="checkbox"/>	G. Geolocation Data: For example, information that can be used to determine a device’s physical location	
We Have Collected/Used in the Past 12 Months	<input checked="" type="checkbox"/>		
This category of personal information is collected and used for the following purposes:	What are the categories of sources from which the personal information was collected?	This category of personal information has been disclosed in the preceding 12 months to the following third parties for a business purpose:	
<ul style="list-style-type: none"> Our third-party provider, HubSpot collects location of IP addresses. 		This is used for ad targeting.	

Please note that Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - 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 (CalFIPA), and the Driver's Privacy Protection Act of 1994.

We will not collect additional categories of personal information or use the personal information for any other undisclosed purpose without providing you advance notice.

Company does not and will not sell your personal information.

Your Right to Request Deletion of Your Personal Information

You have the right to request that Company delete any of your personal information collected or maintained by Company subject to certain exceptions. You can do this through a verified consumer request. That process is described below in the section, “Submitting a Verified Consumer Request.”

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) 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.

Submitting a Verified Consumer Request

You have the right to submit verified consumer requests to know information or for deletion. The request to know can be for any or all of the following about you:

- (1) Specific pieces of personal information that Daxko has;
- (2) Categories of personal information Daxko has collected;
- (3) Categories of sources from which the personal information is collected;
- (4) Categories of personal information that Daxko sold or disclosed for a business purpose;
- (5) Categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- (6) The business or commercial purpose for collecting or selling personal information.

The request to delete is to delete any of your personal information collected or maintained by Company, subject to certain exceptions.

You may only make a verifiable consumer request to know information twice within a 12-month period. 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 that the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Once we receive your verifiable consumer request, we will send you an acknowledgement letter within 10 days which will describe our verification process. We will respond to your request within 45 days, if we are able to verify your identity. Requests for deletion will require a separate confirmation that you want your information deleted.

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.

Please note that, in responding to your request, we are not permitted to disclose or provide you with your Social Security Number, Driver's License Number, or other government issued identification number, financial account number, any health insurance or medical identification number, an account password, or security questions and answers.

Using an Authorized Agent to Submit a Request

Only you, a person registered with the California Secretary of State, or a person 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. If you use an authorized agent, you may provide a power of attorney executed pursuant to California Probate Code sections 4000 to 4465. If a power of attorney that meets those provisions is not submitted, you will be required to verify your identity directly by submitting a verified consumer request according to the procedures in the section "Submitting a Verified Consumer Request." If anyone purporting to be an authorized agent for a consumer contacts us, we will require proof that the authorized agent has been authorized to act on the consumer's behalf.

Your Right to Non-Discrimination for the Exercise of a Privacy Right

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

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- 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.

Changes to Our Privacy Notice

Company reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy 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 for More Information

If you have any questions or comments about this notice, the ways in which Company collects and uses your information, 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: 1-800-478-6020

Website: www.daxko.com

Email: legal@daxko.com

Postal Address: Daxko, LLC

Attn: Legal Department

600 University Park Place, Suite 500

Birmingham, Alabama 35209
