

California Consumer Privacy Rights Notice
Effective: January 30, 2021

This California Consumer Privacy Rights Notice (“Notice”) sets forth Duboce Labs, Inc. (“Company”) disclosure obligations under California law, including the California Consumer Privacy Act of 2018 (“CCPA”) and the California Civil Code section 1798.83. This Notice provides the additional details regarding the information defined as ‘personal information’ under applicable California law and related to a California resident or household (“Consumers” and “You”) further referred to as “Personal Information”.

1. Personal Information Collected and Disclosed:

Company collects, uses and/or discloses Personal Information as follows:

Personal Information Collected, Used and/or Disclosed in Preceding 12 Months					
CCPA Category	Collected?	Source of Collection	Business Purpose	Disclosed or Shared for Business Purpose?	Purpose of Disclosure
Category A: Identifiers & B: Personal Information					
Name/Alias	Yes	You	Performing Services; Auditing; Data Security; Customer Support; Marketing	Yes; Service Provider	Performing Services; Auditing; Data Security; Customer Support; Marketing
Email	Yes	You	Performing Services; Auditing; Data Security; Customer Support; Marketing	Yes; Service Provider	Performing Services; Auditing; Data Security; Customer Support; Marketing
Address	Yes	You	Performing Services	Yes; Service Provider	Payment Processing
Cell or Telephone #	No	N/A	N/A	N/A	N/A
Unique/Online ID (cookies)	YES	Device	Analytics; Auditing; Data Security	Yes; Service Provider	Performing Services; Data Security Analytics; Marketing
IP Address	YES	Device	Debugging Analytics	Yes; Service Provider	Performing Services; Data Security; Analytics; Marketing
Account Name	YES	You	Performing Services; Data Security	N/A	N/A
Social Security #					
Driver’s License#					
Passport #					
Credit or Debit Card # /ACH	YES* *Token only	You	Payment Processing	Yes; Service Provider	Payment Processing* Token only

Other: Medical/Financial/Health					
Category C: Protected Characteristics					
Category D: Commercial Information					
Personal Property Records					
Products/Services Purchased-Obtained-Considered					
Purchasing history/tendencies					
Category E: Biometric Information					
Category F: Internet/Network Activity					
Browsing/search history; Interaction with site/advertisement	Yes	Device	Analytics	Yes; Service Provider	Analytics
Category G: Geolocation data					
Category H: Sensory data					
Electronic					
Audio					
Visual					
Thermal					
Olfactory					
Other Similar					
Category I: Professional/Employment-Related					
Category J: Educational Information					
Category K: Inferences from Data Collected					
Preferences					
Characteristics					
Psychological Trends					
Predispositions					
Behavior					
Attitudes					
Intelligence/Abilities/Aptitudes					

Other Potential Third Party Disclosures: Personal Information may also be disclosed to third parties to serve our legitimate business interests as follows: (1) as required by law, such as to comply with a subpoena, or similar legal process, (2) as part of a merger, acquisition, bankruptcy or other transaction in which a third party assumes control of all or part of the business, (3) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies as required by law; (4) enforce our agreements with you, and/or (5) investigate and defend ourselves against any third-party claims or allegations.

2. Sale of Personal Information

Company does not sell and will not sell your Personal Information. CCPA Addendums have been entered into with applicable service providers certifying they understand the applicable CCPA restrictions relating to their processing of Personal Information.

3. YOUR CONSUMER RIGHTS UNDER CCPA – RIGHT TO KNOW ABOUT PERSONAL INFORMATION COLLECTED, DISCLOSED OR SOLD.

California Consumers may contact Company through their account, by email at privacy@pganalyze.com to exercise the following CCPA Rights:

A. Request Company Disclose At No Charge:

- Specific pieces of personal information it has collected about you;
- categories of Personal Information collected, used, and/or disclosed about you;
- categories of sources from which Personal Information is collected;
- business and/or commercial purposes for collecting and disclosing your Personal Information;
- categories of third parties with whom your Personal Information has been disclosed/shared.

Right to Know Requests can be submitted to Company by email at privacy@pganalyze.com.

B. Request Company to Delete At No Charge:

Except as exempted pursuant to CCPA 1798.105, to request Company delete Personal Information.

Deletion Requests can be submitted to Company by email at privacy@pganalyze.com or by mail to Company at: **Duboce Labs, Inc., Attention: Privacy Request to Delete, 2201 12th Avenue, San Francisco, CA 94116.**

C. Verified Request Process

Company will verify all consumer requests prior to taking any action in response to such request. For consumers that maintain an account with Company, it may verify the identity of the consumer making the request by either matching with the account information on file or through existing account authentication credentials. For non-account holders, Company shall verify to a reasonably high degree of certainty, including matching at least three pieces of consumer personal information with that maintained by Company and/or if necessary, by a signed statement by consumer under penalty of perjury that the requestor is the consumer for which personal information is sought.

Under the CCPA, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. Authorized agents must demonstrate they have written authorization from you to make requests on your behalf. Company may additionally require the consumer to confirm their identity and verify the authorized agent's permission before complying with any request.

D. Consumer Request Limitations

Please note that these rights are not absolute and in certain cases are subject to conditions or limitations as specified in the CCPA, including, but not limited to:

- Company is obligated to disclose/delete only upon a **verifiable** Consumer request from the consumer or an authorized agent acting on behalf of Consumer.
- Consumers may only make a personal information request twice in a 12-month period.
- Deletion is not required because it is necessary for Company to maintain the Personal Information to fulfill the purposes enumerated in CCPA Section 1798.105

Company will confirm and respond to all requests within the timeframe required under the CCPA. In responding to any request to disclose/delete, Company shall maintain a record of the requests as required under the CCPA.

4. Non-Discrimination Policy

You have the right not to receive discriminatory treatment for exercising any rights conferred by the CCPA. Company shall not discriminate against a consumer for exercising any rights under the CCPA, including, but not limited to, (a) denying goods or services, (b) charging different prices or rates (including discounts/penalties) that is not directly related to the value provided to Company for the Personal Information, (c) suggesting Consumer will receive a different rate/price or different level of quality of goods/services

5. Your California Privacy Rights under California Civil Code Section 1798.83 & Business and Professions Code Section 22581

California law permits Consumers to request and obtain from once a year, free of charge, certain information about their Personally Identifiable Information (“PII”) (as defined by California law) disclosed to third parties for direct marketing purposes in the preceding calendar year (if any). If applicable, this information would include a list of the categories of PII that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year.

In addition, a business subject to California Business and Professions Code Section 22581 must allow California residents under age 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted. Your request should include a detailed description of the specific content or information to be removed. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

6. Accessibility of this CCPA Policy.

You can download and print a copy of this Notice here: [California Consumer Privacy Rights Notice](#)

7. Contact Us

Additional detail regarding our collection, use and disclosure of Personal Information, as well as general opt-out rights and other privacy disclosures, is set forth in our general [Privacy Policy](#).

If you have any questions regarding your Personal Information or about our privacy practices, please contact us at: privacy@pganalyze.com.

This Notice was last updated: January 30, 2021