

This California Consumer Privacy Act (“CCPA”) Policy (“CCPA Policy”) is incorporated into Two Six Technologies’ (“TwoSix”) general privacy policy available [here](#) and applies to the personal information of California residents using our website and services (“Consumers,” “you,” or “your”). For purposes of the CCPA, personal information means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household.

In the event of a conflict between this CCPA Policy and any of our other privacy policies, this CCPA Policy shall control only with respect to Consumers and their personal information.

## **Information Collected and Sources**

TwoSix collects personal information from you when you interact with us online through our website [twosixtech.com](https://twosixtech.com) (“Site”) or offline. This includes information that you provide to us directly, information we collect from you automatically, information that we collect when you interact with us such as through your online postings, and information that we may collect from third parties such as service providers, affiliated companies, marketing or data partners, or other third parties with whom you interact. It also includes information that we collect about employees and business partners and vendors from those individuals directly or from references, referrals or consumer reporting agencies. Not all information is collected from everyone who interacts with us.

During the past 12 months, we may have collected the following categories of personal information:

- Identifiers such as contact information (your name, address, phone number, email or postal address), Unique Personal Identifiers (that may include but are not limited to your legal name or preferred alias and online identifiers like user account names), an encrypted version of your password, or communications. We may collect additional information from suppliers, vendors, or employees including business contact information, phone number, email and postal addresses, and titles.
- Protected information such as financial and payment information like your credit or debit card information or PayPal account email address.
- Commercial information such as your transaction histories, billing and shipping information, and product preferences.
- Electronic network activity information such as the internet protocol (IP) address collected from your computers and mobile devices and information about what you do online, including your interactions with our systems and Site, through the use of cookies and similar technologies, system logs, and analytics monitoring.
- Inferences we make about you or your interests based on analysis of other information we have collected.
- Geolocation information.
- Audio or video information such as call center recordings or monitoring records from our customer support centers and security video recordings at our facilities.

- Employment, education and professional related information, protected classification information, or biometrics (collected from current and prospective employees, contractors, service providers, vendors, and suppliers).
- Sensitive Personal Information such as your social security, driver's license, state identification card, or passport number; account log-in credentials; financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation (within 1750 foot radius); and special classification information protected against discrimination such as your racial or ethnic origin, religious or philosophical beliefs, or union membership, genetic data, biometric information, health, sex life or sexual orientation.
- Other types of personal information that we may disclose to you prior to the point of first collection.

## **Business Purposes for Collecting Personal Information**

TwoSix collects personal information in order to operate and grow our business, improve our Site, and to offer our third-party products or services that we think you may find of interest. More specifically, we collect personal information for the following business purposes:

- Provide the Services and information you have requested from us and notices relating thereto, including providing customer and technical support for the Services and collecting fees or other amounts owed in connection with the Services.
- Verify that you qualify as a registered user of the Services.
- Provide information to you about our products or services and third-party products and services that we think may be of interest to you.
- Provide you with marketing communication and information.
- Analyze, improve, and customize the Services including measuring the effectiveness of advertising and internal research on users' interests and behaviors to better serve our users.
- Administer the website, web platform, and Services for internal operations, including troubleshooting, data analysis, testing, research, security, statistical, and survey purposes.
- Respond to your inquiries about posted job positions and evaluate employment applications.
- For legal and compliance reasons, such as the prevention, detection, or investigation of a crime, loss prevention, or fraud.
- Internal and external audit requirements, information-security purposes, and as we otherwise believe to be necessary or appropriate: (a) under applicable law, which may include laws outside your country of residence; (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence; (c) to enforce our terms and conditions or other agreements; and (d) to protect our rights, privacy, safety, or property, or those of other persons.

## **Disclosing Personal Information**

We may reveal information about you to unaffiliated third parties: (1) if you request or authorize it; (2) if the information is provided to help complete a transaction for you; (3) if the information is provided to comply with the law, applicable regulations, governmental and quasi-governmental requests, court orders or subpoenas, to enforce our Terms of Use or other agreements, or to protect our rights, property, or safety or the rights, property, or safety of our users or others (e.g. to a consumer reporting agency for fraud protection, etc.); (4) if the disclosure is done as part of a purchase, transfer, or sale of services or assets (e.g. in the event that substantially all of our assets are acquired by another party, customer information may be one of the transferred assets); (5) if the information is provided to our agents, outside vendors, or service providers to perform functions on our behalf (e.g. analyzing data, providing marketing assistance, providing professional legal or accounting services, providing customer service, processing orders, etc.); or (6) as otherwise described in this Privacy Policy.

### **Information Shared for a Business Purpose**

During the past 12 months, we may have disclosed the following categories of personal information to the following types of third parties for a business purpose:

- **Our affiliated companies:** We may have shared your information such as identifiers, commercial information, and inferences within our company and our affiliated companies for the purposes of decision making, reporting, management, analysis, administering programs, promoting service offerings, and other business purposes.
- **Service providers:** We may have shared your information such as identifiers, commercial information, and financial information with our service providers who provide us support services such as hosting our Site, processing payments, legal and accounting professional services, postal delivery and electronic mail, mobile messages, product delivery, conducting analysis to improve our products and Site, fulfilling requests you make, managing payments, and answering your questions. Service providers only use the information they receive from us for the purposes we hired them for; we don't allow them to retain, use, otherwise handle the data for their own purposes, or combine data with information they receive from other sources.
- **Marketing Partners:** We may have shared your information such as electronic network activity, identifiers, commercial information and inferences with marketing partners to display online, mobile or other advertising based on your activity on websites and mobile apps, and preferences you share with us so we can provide you with promotions and special offers that may interest you. We may also share information with marketing partners to help us analyze data, sometimes combined with other sources, so that we can send more relevant communications to you.
- **With Third Parties, including governmental authorities and law enforcement, for legal or compliance purposes:** We may share any or all categories of your information where we believe the disclosure is required by law or otherwise necessary to comply with the law, regulatory requirements, requests from public authorities, or to enforce our agreements or policies or protect or defend the rights and property of our customers, the company, our partners, or the public (including for fraud prevention purposes).

### **Selling Personal Information**

We do not sell your information for monetary or any other valuable consideration.

## **Sharing Personal Information for Cross-Context Behavioral Marketing**

Sharing your personal information means making it available to a third party so that they can use it to display targeted or cross-context behavioral advertisement to you. Cross-context behavioral or targeted advertising means that we display an advertisement to you that is selected based on personal information about you that we obtained or inferred over time from your activities across other companies' websites, applications or online services that we use to predict your preferences or interests. These types of advertising do not include using your interactions with us or information that you provide to us to select advertisements to show you. In the preceding twelve (12) months, we have shared the following categories of personal information of non-minors for behavioral or cross context or targeted advertising. "We do not engage in cross-context behavioral or targeting advertising."

## **Processing and Disclosing Sensitive Personal Information**

We collect, process and disclose Sensitive Personal Information only for the purposes disclosed at the time we collect this information and for the purposes permitted by the CCPA. Permitted purposes include providing and performing our business services, maintaining security, complying with our legal obligations and enforcing or defending our or others' legal rights, ensuring physical safety of our customers and employees, and quality control and improvement of our services.

## **Your CCPA Rights and How to Exercise Them**

Verified California residents have the right to:

- Request and receive disclosure of our personal information collection practices during the prior 12 months, including the categories of personal information we collect, the categories of sources of such information, our business purpose for collecting or sharing such information, and the categories of third parties with whom we share such information;
- Request and receive a copy of the personal information we have collected about them during the prior 12 months or at their option since 1/1/22;
- Request and receive disclosure of our information sharing practices during the prior 12 months, including a list of the categories of personal information sold with the category of third party recipients and a list of the categories of personal information that we disclosed for a business purpose;
- Request that we delete (and direct our service providers to delete) their personal information subject to certain exceptions;
- Request that we correct information about them that is inaccurate;
- Request that we not sell personal information about them (we do not sell personal information);
- Request that we not share personal information about them for cross-context behavioral or targeted marketing purposes (we do not engage in these activities) and

- Request that we not process Sensitive Personal Information about them other than for permitted purposes (we only process this information for permitted purposes).

In order to make a request for disclosure, California residents may contact us by either by calling (703) 543-9662 or emailing us at [info@twosixtech.com](mailto:info@twosixtech.com). We will ask you for information that allows us to reasonably verify your identity (that you are the person about whom we collected personal information) and will use that information only for that purpose. We may request that you submit a signed statement under penalty of perjury that you are the individual you claim to be. We will acknowledge receipt of your request within 10 days and will endeavor to respond within forty-five days of receipt of your request, but if we require more time (up to an additional forty-five days) we will notify you of our need for additional time. Please understand that we cannot respond to your request or provide you with personal information if we cannot verify your identity and confirm that the personal information relates to you.

You may make a request for disclosure of our information collection practices, the information we collected about you, or our sharing practices up to two times within a 12-month period. You may make a request for deletion or correction of your information at any time.

For requests for a copy of the personal information we have collected about you, we will endeavor to provide the information in a format that is readily useable, including by mailing you a paper copy or providing an electronic copy to your registered account, if you have registered an account with us. There may be some information about you that we are not permitted or required to disclose to you, such as certain employee information and information used for security purposes.

For requests for deletion of your information, please understand that California law permits us to retain certain information and not to delete it under certain circumstances. For example, we are not required to comply with a request to delete information if the information is necessary for us to complete a transaction for you or otherwise perform a contract; to detect, protect against, or prosecute security incidents, fraud, or illegal activity; to use the information only internally in ways reasonably aligned with your expectations as our customer (such as maintaining sales records), and to comply with legal obligations. If we receive such a request from you, we will notify any service providers we have engaged to delete your information as well.

We will not discriminate against you as a result of your exercise of any of these rights.

## **Using an Authorized Agent**

You may submit a request through someone holding a formal Power of Attorney. Otherwise, you may submit a request using an authorized agent only if (1) the person is registered with the Secretary of State to do business in California, (2) you provide the authorized agent with signed written permission to make a request, (3) you verify directly with us that you have authorize the person to make the request on your behalf, (4) you verify your own identity directly with us, and (5) your agent provides us with proof that they are so authorized. We will require the agent to submit proof to us that they have been authorized to make requests on your behalf.

## **Retention of Personal Information**

We will store personal information in a form which permits us to identify consumers, for as long as necessary for the purpose for which the personal information is processed. We may retain and use such personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements and rights, or if it is not technically reasonably feasible to remove it. We retain information consumers provide in connection with requests made under the CPRA for a period of two years.

## **Contacting Us**

If you have questions or concerns, please contact us by phone at (703) 543-9662, emailing us at [info@twosixtech.com](mailto:info@twosixtech.com), or by postal mail at Two Six Technologies, 901 N. Stuart Street, Suite 1000, Arlington, VA 22203.