

XI. Notices to California Residents

The information in this section only applies to California residents.

A. Your California Privacy Rights

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Under California Civil Code Section 1798.83 (known as Shine the Light Law”), if you are a resident of California, you may request certain information about disclosure of personal information about you during the prior calendar year to third parties for their direct marketing purposes. To make such a request, please write to us at (1230 W. Washington St., Suite 310, Tempe, AZ 85288).

If you are a California resident, the California Consumer Privacy Act, as modified by the California Privacy Rights Act (collectively, the “CCPA”, along with subsequent clarifying CCPA legislation, implementing regulations, and other California privacy laws, provides you certain rights and choices regarding how we collect, share, use, and protect your “personal information” as information that identifies, relates, describes, or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

We do not disclose “sensitive personal information.”

Exceptions

Certain information that we collect may be exempt from the CCPA because it is considered public information or covered by financial privacy laws, such as the Gramm-Leach Bliley Act, the California Financial Information Privacy Act, the Health Insurance Portability and Accountability Act, or the Fair Credit Reporting Act, or may be exempt for other legitimate business purposes.

We collect the following categories of “personal information” or “sensitive personal information” for the purposes outlined in this Privacy Policy.

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.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, employment, employment history, bank account number, or any other financial information. Some personal information included in this category may overlap with other categories.
C. Protected classification characteristics under California or federal law.	Age (40 years or older), citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status.
D. Biometric information.	We do not collect biometric information.
E. Internet or other similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
F. Geolocation data.	Physical location or movements.
G. Sensory data.	Audio recordings of customer calls.
H. Professional or employment-related information.	Current or past job history or performance evaluations.

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 contract that describes the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract.

You have the right, at any time, to request that your personal information not be sold or shared. We will not sell or share the personal information of anyone we know is under 16 years old.

In the preceding 12 months we have not sold any category of personal information.

Your Rights and Choices

The CCPA provides 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”). 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 selling 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 to take similar action.

Right To Correct

The right to correct any inaccurate personal information that is maintained about the consumer.

Exercising Your Rights to Know or Delete

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

- Calling us at 1-800-560-3450
- Emailing us at privacy@unlock.com

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information. Your authorized agent may make a request on your behalf after verifying their identity and providing a valid power of attorney given to your authorized agent pursuant to applicable state law where you reside. If you have not provided your authorized agent a power of attorney we may require you or your agent to take additional steps to permitted by law to verify that your request has been authorized, to verify your identity and that of the authorized agent, and that you have given permission to your authorized agent to submit a request on your behalf.

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, which may include:
 - Providing personal identifiers we can match against information we may have collected about you previously
 - Confirming your request by email or telephone call to the email address or phone number stated in your request

- Providing government identification
- 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@unlock.com.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 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, at your option.

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

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the following Internet Web page link:

<https://www.unlock.com/privacy-policy/>

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by:

Non-Discrimination

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.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.