

Ponto Software, Inc. California Resident Privacy Notice

This California Resident Privacy Notice (“**Notice**”) supplements the information and disclosures contained in our [Privacy Policy](#). It applies to individuals residing in California from whom we collect Personal Information as a business under the CCPA.

This Notice does not apply to nonpublic personal information collected from California residents pursuant to the Gramm-Leach Bliley Act (“**GLBA**”). For example, this Notice does not apply to California residents who utilize financial products or services offered by us for personal, family, or household purposes. For additional information with respect to how we collect, disclose, and secure information relating to these customers, please refer to our U.S. Consumer Privacy Notice [here](#).

Personal Information Collection, Disclosure, and Sale

For the purposes of this notice, **Personal Information** means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, or as otherwise defined by the California Consumer Privacy Act of 2018 (California Civil Code §§ 1798.100 to 1798.199) and its implementing regulations, as amended or superseded from time to time (“**CCPA**”).

Personal Information does not include information that is:

- Lawfully made available from government records.
- Deidentified or aggregated.
- Otherwise excluded from the scope of the CCPA, such as information collected pursuant to the GLBA.

The chart below provides the categories of Personal Information (as defined by the CCPA) we have collected, disclosed for a business purpose, or sold in the preceding twelve months since this notice was last updated. The examples of Personal Information provided for each category reflect each category’s statutory definition and may not reflect all of the specific types of Personal Information associated with each category.

Category	We Collect	We Disclose	We Sell
A. Identifiers <i>Examples:</i> 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.	Yes	No	No
B. Categories of Personal Information in Cal. Civ. Code Section 1798.80(e) <i>Examples:</i> 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.	No	N/A	N/A
C. Characteristics of Protected Classifications under California or Federal Law	No	N/A	N/A

<p><i>Examples:</i> Race or color, ancestry or national origin, religion or creed, age (over 40), mental or physical disability, sex (including gender and pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, gender identity or expression, medical condition, genetic information, marital status, military and veteran status.</p>			
<p>D. Commercial Information</p> <p><i>Examples:</i> Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	Yes	Yes	No
<p>E. Biometric Information</p> <p><i>Examples:</i> Physiological, biological, or behavioral characteristics, including DNA, that can be used, singly or in combination with each other or with other identifying data, to establish individual identity, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.</p>	Yes	No	No
<p>F. Internet or Other Electronic Network Activity Information</p> <p><i>Examples:</i> Browsing history, search history, and information regarding a consumer's interaction with an internet website, application or advertisement.</p>	Yes	Yes	No
<p>G. Geolocation Data</p> <p><i>Example:</i> Precise physical location.</p>	Yes	No	No
<p>H. Sensory Information</p> <p><i>Examples:</i> Audio, electronic, visual, thermal, olfactory, or similar information.</p>	No	N/A	N/A
<p>I. Professional or Employment-Related Information</p> <p><i>Examples:</i> Job application or resume information, past and current job history, and job performance information.</p>	Yes	No	No
<p>J. Non-Public Education Information (as defined in 20 U.S.C. 1232g; 34 C.F.R. Part 99)</p> <p><i>Examples:</i> Records that are directly related to a student maintained by an educational agency or institution or by a party acting for the agency or institution.</p>	No	N/A	N/A
<p>K. Inferences Drawn from Personal Information</p> <p><i>Examples:</i> Consumer profiles reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	No	No	No

Use of Personal Information

We collect, use, and disclose your Personal Information in accordance with the specific business and

commercial purposes below:

1. **Providing Services:** Providing our services.
2. **Communicating:** Communicating with you, providing you with updates and other information relating to our services and products, providing information that you request, responding to comments and questions, and otherwise providing customer support.
3. **Personalization:** Personalizing your experience on our services, such as presenting tailored content.
4. **Sending Messages:** Sending you text messages or push notifications.
5. **Facilitating Payments:** Facilitating transactions and payments.
6. **Deidentification and Aggregation:** Deidentifying and aggregating information collected through our services and using it for lawful purposes.
7. **Job Applications:** Processing your job application.
8. **Compliance:** For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.
9. **Auditing Interactions:** Auditing related to your interaction with our services and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with other standards.
10. **Fraud and Incident Prevention:** Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
11. **Debugging:** Debugging to identify and repair errors that impair existing intended functionality.
12. **Contracting Vendors:** Contracting with vendors and service providers to perform services on our behalf or on their behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing.
13. **Improving Our Services:** Undertaking activities to verify or maintain the quality or safety of our services, and to improve, upgrade, or enhance our services.
14. **Enabling Transactions:** Otherwise enabling or effecting, directly or indirectly, a commercial transaction.
15. **Notified Purpose:** For other purposes for which we provide specific notice at the time the information is collected.

Collection of Personal Information

In the preceding twelve months since this notice was last updated, we have collected Personal Information from the following categories of sources:

1. **You/Your Devices:** You or your devices directly.
2. **Users:** Other users of our services.
3. **Affiliates.**
4. **ISPs:** Internet service providers.
5. **Analytics Providers.**
6. **OS/Platform Provider:** Operating systems and platforms.
7. **Social Networks.**
8. **Resellers:** Consumer data brokers.
9. **Partners:** Business partners and our corporate clients.
10. **Public:** Publicly accessible sources.

Disclosure of Personal Information

In the preceding twelve months since this notice was last updated, we disclosed Personal Information to the following categories of third parties:

- I. **ISPs:** Internet service providers.
 - o Personal Information we share: Identifiers and Internet or Other Electronic Network Activity.
- II. **Analytics Providers.**

- Personal Information we share: Identifiers, Commercial Information, Internet or Other Electronic Network Activity.
- III. **Vendors:** Vendors and service providers.
 - Personal Information we share: Identifiers, Commercial Information, and Internet or Other Electronic Network Activity.
- IV. **Third Parties as Legally Required:** Third parties as required by law and similar disclosures.
 - Personal Information we share: Identifiers and Internet or Other Electronic Network Activity.

Your California Privacy Rights

If you are a California resident, you may exercise the following rights.

Right to Know and Access. You may submit a verifiable request for information regarding the: (1) categories of Personal Information collected, sold, or disclosed by us; (2) purposes for which categories of Personal Information are collected or sold by us; (3) categories of sources from which we collect Personal Information; (4) categories of third parties with whom we disclosed or sold Personal Information; and (5) specific pieces of Personal Information we have collected about you during the past twelve months.

Right to Delete. Subject to certain exceptions, you may submit a verifiable request that we delete Personal Information about you that we have collected from you.

Verification. Requests for access to or deletion of Personal Information are subject to our ability to reasonably verify your identity in light of the information requested and pursuant to relevant CCPA requirements, limitations, and regulations.

Right to Opt Out. We do not sell your Personal Information.

Right to Equal Service and Price. You have the right not to receive discriminatory treatment for the exercise of your CCPA privacy rights, subject to certain limitations.

Submit Requests. To exercise your rights under the CCPA, please write to us by email or mail via the information provided in the Contact Information section.

Authorizing an Agent. If you are acting as an authorized agent to make a request to know, delete, or opt out on behalf of a California resident, please provide a written authorization signed by the resident, and we will contact you and the resident with further steps required to verify the resident's identity.

Do Not Track

There is no accepted standard on how to respond to Do Not Track signals, and we do not respond to such signals.

Contact Information

If you have any questions, comments, or concerns about this notice or our processing activities please write to us by email at support@ponto.org or by mail at Ponto Software Company, Inc., 155 Montgomery Street, Suite 700, San Francisco, CA 94104.

Last Reviewed and Updated: 10/06/2022