

## **California Consumer Privacy Act Rights**

This notice, effective on January 1, 2020, provides specific information for California residents and is part of our privacy policy. As of January 1, 2020, verified California residents will 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.
- 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 not sell personal information about them (we do not sell your personal information) and;
- request that we delete (and direct our service providers to delete) their personal information subject to certain exceptions.

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 order to make a request for disclosure, California residents may contact us by:

- (1) Toll-free telephone: 1-877-932-6640
- (2) Email: [privacy@xe.com](mailto:privacy@xe.com)
- (3) Complete the [Webform](#)

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 ten (10) days and will endeavor to respond within forty-five (45) 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. 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 twice within a 12-month period.

For requests for a copy of the personal information we have collected during the 12 months prior to your request 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.

For requests for deletion of your information California law permits us to retain certain information and not to delete it under certain circumstances. By way of 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.

We do not sell your information for monetary consideration and we do not disclose your information for other valuable consideration. If, in the future, we enter into arrangements that fall within the definition of a “sale” under the CCPA, we will update this privacy policy and our compliance with the CCPA.

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) you provide the authorized agent with written permission to make a request and (2) you verify your own identity directly with us. We will require the agent to submit proof to us that they have been authorized to make requests on your behalf.

During the past 12 months, we have collected the following categories of information from the listed sources, used it for the listed business purposes and shared it with the listed categories of third parties. The categories of information include information we collect from our website visitors, registered users, employees, vendors, suppliers and any other person that interacts with us either online or offline. Not all information is collected about all individuals. For instance, we may collect different information from applicants for employment or from vendors or from customers.

Category of Information collected	Source	Business purposes for use	Categories of third parties receiving information
<b>Identifiers</b> (name, alias, postal address, email address, phone number, fax number, account name, Social Security number, driver's license number, passport number, unique personal identifier, IP address)	<ul style="list-style-type: none"> <li>• Individuals submitting information to us;</li> <li>• information we automatically collect from site visitors</li> <li>• information we may receive from third-party marketing and data partners.</li> </ul>	<ul style="list-style-type: none"> <li>• Auditing relating to transactions;</li> <li>• security detection, protection and enforcement;</li> <li>• functionality debugging/error repair;</li> <li>• performing services for you;</li> <li>• internal research and development;</li> <li>• quality control;</li> <li>• ad customization</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers (such as payment processors, mail houses, marketing partners, shipping partners, employee benefits partners);</li> <li>• affiliated companies;</li> <li>• government regulators;</li> <li>• law enforcement;</li> <li>• strategically aligned businesses;</li> </ul>

<p><b>Sensitive Information</b> (name with financial account, medical, health, and health insurance information, username and password)</p>	<ul style="list-style-type: none"> <li>• Individuals submitting information;</li> <li>• employment applications;</li> <li>• employees.</li> </ul>	<ul style="list-style-type: none"> <li>• Auditing relating to transactions;</li> <li>• security detection, protection and enforcement;</li> <li>• functionality debugging/error repair;</li> <li>• performing services for you;</li> <li>• internal research and development; quality control;</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers (such as payment processors, mail houses, marketing partners, shipping partners, employee benefits partners);</li> <li>• affiliated companies;</li> <li>• government regulators;</li> <li>• law enforcement;</li> <li>• strategically aligned businesses;</li> </ul>
<p><b>Protected classification information</b> (race, gender, ethnicity, religion)</p>	Not collected.	Not collected.	Not collected.
<p><b>Commercial information</b> (transaction history, products/services purchased, obtained or considered, product preference)</p>	<ul style="list-style-type: none"> <li>• Individuals submitting information;</li> <li>• information we automatically collect from site visitors;</li> <li>• information we may receive from third-party marketing or data partners.</li> </ul>	<ul style="list-style-type: none"> <li>• Auditing relating to transactions;</li> <li>• security detection, protection and enforcement;</li> <li>• functionality debugging/error repair;</li> <li>• performing services to you;</li> <li>• internal research and development; quality control;</li> <li>• ad customization.</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers (such as payment processors, mail houses, marketing partners, shipping partners, employee benefits partners),</li> <li>• affiliated companies,</li> <li>• government regulators,</li> <li>• law enforcement,</li> <li>• strategically aligned businesses,</li> </ul>
<p><b>Electronic network activity</b> (browsing or search history, website interactions, advertisement interactions)</p>	<ul style="list-style-type: none"> <li>• Information automatically collected from site visitors.</li> </ul>	<ul style="list-style-type: none"> <li>• Auditing relating to transactions;</li> <li>• security detection, protection and enforcement;</li> <li>• functionality debugging/error repair;</li> <li>• performing services for you;</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers (such as payment processors, mail houses, marketing partners, shipping partners, employee benefits partners);</li> <li>• affiliated companies;</li> </ul>

		<ul style="list-style-type: none"> <li>• internal research and development;</li> <li>• quality control;</li> <li>• ad customization.</li> </ul>	<ul style="list-style-type: none"> <li>• government regulators;</li> <li>• law enforcement;</li> <li>• strategically aligned businesses.</li> </ul>
<b>Audio, video or similar information</b> (customer service calls, security monitoring)	<ul style="list-style-type: none"> <li>• Individuals submitting information;</li> <li>• information we collect for security purposes.</li> </ul>	<ul style="list-style-type: none"> <li>• Auditing relating to transactions;</li> <li>• security detection, protection and enforcement;</li> <li>• functionality debugging/error repair;</li> <li>• performing services for you;</li> <li>• internal research and development;</li> <li>• quality control.</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers (such as payment processors, mail houses, marketing partners, shipping partners, employee benefits partners);</li> <li>• affiliated companies;</li> <li>• government regulators;</li> <li>• law enforcement;</li> <li>• strategically aligned businesses.</li> </ul>
<b>Biometrics</b>	Not collected.	Not collected.	Not collected.
<b>Geolocation</b>	<ul style="list-style-type: none"> <li>• Information we automatically collect from site visitors.</li> </ul>	<ul style="list-style-type: none"> <li>• Auditing relating to transactions;</li> <li>• security detection, protection and enforcement;</li> <li>• functionality debugging/error repair;</li> <li>• performing services for you;</li> <li>• internal research and development;</li> <li>• quality control;</li> <li>• ad customization.</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers (such as payment processors, mail houses, marketing partners, shipping partners, employee benefits partners);</li> <li>• affiliated companies;</li> <li>• government regulators;</li> <li>• law enforcement;</li> <li>• strategically aligned businesses.</li> </ul>
<b>Professional, educational or employment related information</b>	<ul style="list-style-type: none"> <li>• Information submitted by individuals;</li> <li>• information received from third parties in connection with vendor or employment status or applications;</li> </ul>	<ul style="list-style-type: none"> <li>• Auditing relating to transactions;</li> <li>• security detection, protection and enforcement;</li> <li>• functionality debugging/error repair;</li> <li>• performing services for you;</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers (such as payment processors, mail houses, marketing partners, shipping partners, employee benefits partners);</li> <li>• affiliated companies;</li> </ul>

	<ul style="list-style-type: none"> <li>information we observe in connection with vendor or employment oversight.</li> </ul>	<ul style="list-style-type: none"> <li>internal research and development;</li> <li>quality control;</li> <li>ad customization.</li> </ul>	<ul style="list-style-type: none"> <li>government regulators;</li> <li>law enforcement;</li> <li>strategically aligned businesses;</li> </ul>
<p><b>Inference from the above</b> (preferences, characteristics, behavior, attitudes, abilities, etc.)</p>	<ul style="list-style-type: none"> <li>Internal analytics</li> </ul>	<ul style="list-style-type: none"> <li>Auditing relating to transactions;</li> <li>security detection, protection and enforcement;</li> <li>functionality debugging/error repair;</li> <li>performing services for you;</li> <li>internal research and development;</li> <li>quality control;</li> <li>ad customization.</li> </ul>	<ul style="list-style-type: none"> <li>Service providers (such as payment processors, mail houses, marketing partners, shipping partners, employee benefits partners);</li> <li>affiliated companies;</li> <li>government regulators;</li> <li>law enforcement;</li> <li>strategically aligned businesses;</li> </ul>

\*More specifically, the business purposes include:

1. Performing services for you:
  - To administer or otherwise carry out our obligations in relation to any agreement to which we are a party;
  - To assist you in completing a transaction or order;
  - To allow tracking of shipments;
  - To prepare and process invoices;
  - To respond to queries or requests and to provide services and support;
  - To provide aftersales customer relationship management;
  - To create and manage our customer accounts;
  - To notify you about changes to our services and products;
  - To administer any promotion, contest, survey, or competition;
  - To provide you information regarding our products and services,
  - To offer our products and services to you in a personalized way, for example, we may provide suggestions based on your previous requests to enable you to identify suitable products and services more quickly.
  
2. Auditing relating to transactions, internal research and development:
  - To provide for internal business administration and operations, including troubleshooting, Site customization, enhancement or development, testing, research, administration and operation of our Sites and data analytics;
  - To create products or services that may meet your needs;
  - To measure performance of marketing initiatives, ads, and websites “powered by” another company on our behalf.
  
3. Security detection, protection and enforcement; functionality debugging, error repair:

- As part of our efforts to keep our Sites safe and secure;
  - To ensure the security of your account and our business, preventing or detecting fraud, malicious activity or abuses of our Sites, for example, by requesting verification information in order to reset your account password (if applicable);
  - To ensure the physical security of our premises through the monitoring of surveillance images;
    - To resolve disputes, to protect the rights, safety and interests ourselves, our users or others, and to comply with our legal obligations.
4. Quality control:
- To monitor quality control and ensure compliance with our legal obligations, codes and ordinances, policies and procedures,
  - To develop and improve our products and services, for example, by reviewing visits to the Sites and various subpages, demand for specific products and services and user comments.