



## Privacy Addendum for California-Clients

**In addition to our privacy notice, there are extra protections in place for clients residing in California. Thus, this serves as an addendum to our original privacy notice. Anything omitted from this addendum but mentioned in our original privacy notice is still applicable. It is important that we maintain the trust and confidence of our clients. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information by complying with the California Consumer Privacy Act. This notice is provided to you on behalf of Advanced Regulatory Compliance, LLC (“ARC”).**

As a California consumer, you have the right and ability to request that we disclose the personal information that we collect, use, disclose, and sell. More specifically, you have rights to the following without any additional charge:

- Any information regarding the categories of personal information. For example, after we verify your request, you have the ability to request the categories of personal information we have collected, the sources we use to we collect personal information, our business purpose for collecting personal information, the third parties involved, and, if any, the specific pieces of personal information we have collected about you.
- We do not retain any personal information about you if we do not normally collect this information in a normal business transaction. This information about you is not maintained as personal information and upon your request, we reserve our right not to provide this “personal information” to you more than twice in a 12-month period.

### **Additional Rights to Opt-Out of Sale of Personal Information**

- A “sale” under California law is defined as any transfer of personal information for value. Because personal information is valuable to the mechanics of most businesses, most companies that utilize a website can be selling your information under the law. You have the right to opt-out of the sale of your personal information. We do not sell personal information other than website analytics data.
- If you exercise your right to opt-out of the sale of your personal information, we will refrain from selling your personal information, unless you subsequently provide express authorization for the sale of your personal information.
- To opt-out of the sale of your personal information, click on the [Do Not Sell My Personal Information](#) link at the bottom of any page on our website.

### **Additional Protection to Children’s Personal Information**

- Our website is available for use for individuals over the age of 18 years of age. This is the age that allows individuals or entities to form legally binding contracts under applicable law. Thus, you warrant that you are eighteen (18) years of age or older to use our website.
- We do not knowingly collect personal information from individuals under 18 years of age, and do not sell the personal information of minors under 16 years of age without affirmative authorization.

### **Additional Rights to Delete Personal Information**

- Upon your submission of a verifiable request, you have the right to delete your personal information from our records and instruct us to request our service providers to delete your personal information from their records as well.

- However, we are not required to, and reserve our right not to, delete your personal information if is necessary to complete the business transaction. Here are the situations that we may not be required to delete your information:
  - When personal information was collected or reasonably anticipated within the context of our ongoing business relationship with you. This can include when we provide a good or service requested by you that would require personal information, when we perform a contract between you and us that would require personal information, and when we may detect security incidents;
  - When we attempt to protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity;
  - When we attempt to debug, identify, or repair errors that impair existing intended functionality;
  - When we exercise free speech to ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law;
  - When we comply with the California Electronic Communications Privacy Act;
  - When we comply with an existing legal obligation; and
  - When we use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

#### **Additional Freedoms from Discrimination**

- Under the California Consumer Privacy Act, you have the right to not be discriminated against by us if you exercise any of your rights. This means that if you decide to opt out, or click on the “Do Not Sell My Personal Information” link, we are unable to do the following actions:
  - deny goods or services to you;
  - charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
  - provide a different level or quality of goods or services to you; or
  - suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

#### **Exercising your Rights**

Unless otherwise specified, to exercise any of your rights described in this Notice, please complete a data subject request form available [here](#) or call us toll-free at (310) 275-7300.

In order to verify your request, you will need to provide us with enough information to identify you, verify your identity and address, and a description of what right you’d like to exercise. We may ask you for additional information if you do not provide us with enough information.

You may also designate an authorized agent to make a request under the California Consumer Privacy Act on your behalf. In order to fulfill your request by an authorized agent, you must provide written permission indicating the authorized agent’s representation. We may also require you verify your own identity with us directly before we complete your request.

We reserve our right not to make a data access or portability disclosure if we cannot verify that the person making the request is legitimate or authorized to act on such person’s behalf. Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification. You will not have to pay a fee to exercise your rights described. However, we may charge a reasonable fee or decline to comply with your request if your request is clearly unfounded, repetitive, or excessive. You may only make a request to know or receive personal information twice within a 12-month period.