

Otrium California Resident Privacy Notice

This California Resident Privacy 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.

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 as amended by the California Privacy Rights Act of 2020 (California Civil Code §§ 1798.100 to 1798.199) and its implementing regulations, as amended or superseded from time to time (“**CCPA**”).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.

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

Category	Collected	Disclosed	Sold/Shared
A. Identifiers <i>Examples:</i> Name, postal address, internet protocol address, and email address.	Yes	Yes	No
B. Categories of Personal Information in Cal. Civ. Code Section 1798.80(e) <i>Examples:</i> Name, address, telephone number, education, employment, and employment history.	Yes	Yes	No
C. Characteristics of Protected Classifications under California or Federal Law <i>Examples:</i> Gender identity or expression.	Yes	Yes	No
D. Commercial Information <i>Examples:</i> Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes	Yes	No
E. Biometric Information <i>Examples:</i> Physiological, biological, or behavioral characteristics, including DNA, that can be used,	No	N/A	N/A

<p>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>			
<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>	No	No	No
<p>G. Geolocation Data</p> <p><i>Example:</i> Precise physical location.</p>	No	N/A	N/A
<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	Yes	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>	Yes	Yes	No
<p>L. Sensitive Personal Information (Identifiers)</p> <p><i>Examples:</i> A consumer's social security, driver's license, state identification card, or passport number.</p>	No	N/A	N/A
<p>M. Sensitive Personal Information (Log-In and Financial Information)</p> <p><i>Examples:</i> Account log-in, financial account, debit card, or credit card number in combination with any</p>	No	N/A	N/A

required security or access code, password, or credentials allowing access to an account.			
N. Sensitive Personal Information (Precise Geolocation) Geolocation data used to locate a consumer within a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet.	No	N/A	N/A
O. Sensitive Personal Information (Group Membership) <i>Examples:</i> Racial or ethnic origin, religious or philosophical beliefs, or union membership.	No	N/A	N/A
P. Sensitive Personal Information (Contents of Communications) <i>Examples:</i> The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.	No	N/A	N/A
Q. Sensitive Personal Information (Genetic Data)	No	N/A	N/A
R. Sensitive Personal Information (Identifying Biometric Information)	No	N/A	N/A
S. Sensitive Personal Information (Personal Information Collected and Analyzed Concerning a Consumer's Health)	No	N/A	N/A
T. Sensitive Personal Information (Personal Information Collected and Analyzed Concerning a Consumer's Sex Life or Sexual Orientation)	No	N/A	N/A

Use of Personal Information

We collect your Personal Information for the following specific business and commercial purposes:

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. **Marketing:** Marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable or otherwise of interest to you.
4. **Personalization:** Personalizing your experience on our services, such as presenting tailored content.
5. **Facilitating Payments:** Facilitating transactions and payments.
6. **Job Applications:** Processing your job application.
7. **Safety Issues:** Responding to trust and safety issues that may arise.
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, providing advertising or marketing services, providing analytics services, or providing similar services on behalf of the business or service provider.
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

We collect Personal Information from the following categories of sources:

1. **You/Your Devices:** You or your devices directly.
2. **Advertising Networks.**
3. **Analytics Providers.**
4. **Partners:** Business partners.

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 for the purposes of marketing, facilitating payments, enabling transactions, auditing interactions, contracting vendors, improving our services, and providing services:

- I. **Advertising Providers:** Advertising technology companies, such as advertising networks.
 - Personal Information we disclosed: Identifiers, Commercial Information, Internet or Other Electronic Network Activity Information, Inferences Drawn from Personal Information
- II. **Analytics Providers.**
 - Personal Information we disclosed: Identifiers, Commercial Information, Internet or Other Electronic Network Activity Information, Inferences Drawn from Personal Information
- III. **Vendors:** Vendors and service providers.
 - Personal Information we disclosed: Identifiers, Categories of Personal Information in Cal. Civ. Code Section 1798.80(e), Characteristics of Protected Classifications under California or Federal Law, Commercial Information, Internet or Other Electronic Network Activity Information, Professional or Employment-Related Information, Inferences Drawn from Personal Information

Sharing of Personal Information

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

- I. **Advertising Providers:** Advertising technology companies, such as advertising networks.

- Personal Information we have shared: Identifiers, Commercial Information, Internet or Other Electronic Network Activity Information, Inferences Drawn from Personal Information
- II. **Analytics Providers.**
- Personal Information we have shared: Identifiers, Commercial Information, Internet or Other Electronic Network Activity Information, Inferences Drawn from Personal Information

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 to 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.

Right to Correct. You may submit a verifiable request that we correct inaccurate Personal Information that we maintain about you.

Verification. Requests for access to, deletion of, or correction 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. To verify your access, deletion, or correction request, please follow the instructions provided in our response to your request.

Right to Opt Out. In some circumstances, you may opt out of the sale or sharing (for cross-context behavioral advertising purposes) of your Personal Information. Click [here](#) to opt out of the sale or sharing (for cross-context behavioral advertising purposes) of your Personal Information.

Right to Limit Use and Disclosure of Sensitive Personal Information. In some circumstances, you may limit our use and disclosure of your Sensitive Personal Information. We do not use or disclose your Sensitive Personal Information for purposes other than the limited purposes permitted by the CCPA.

Right of No Retaliation. You have the right not to receive discriminatory treatment for the exercise of your CCPA privacy rights, subject to certain limitations, including if you are an employee, applicant, or independent contractor of our business.

Submit Requests. To exercise your rights under the CCPA, please send an email to the email address in the Contact Information section below.

Authorizing an Agent. If you are acting as an authorized agent to make a request to know, delete, correct, or opt out on behalf of a California resident, please fill out this form: <https://help.otrium.nl/en/articles/387>.

Additional Disclosures

Minors. We do not knowingly sell or share (for cross-context behavioral advertising purposes) Personal Information of consumers under 16 years of age.

Contact Information

If you have any questions, comments, or concerns about this notice or our processing activities, please email us at privacy@otrium.com or write to us at Otrium B.V., Danzigerkade 16A, 1013AP Amsterdam.

Last Reviewed and Updated: October 2023