

Ancora California Consumer Privacy Act Disclosure for California Residents

Reviewed on: December 31, 2021

This **Privacy Notice for California Residents** supplements the information contained in Ancora's Online Privacy Statement <https://ancora.net/disclosures/>, and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (CCPA), and any terms defined in the CCPA have the same meaning when used in this Notice.

Sales of Personal Information

We do not sell your personal information.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as:
 - the information that you provide to us when you submit an insurance application with financial and medical information is not covered by the CCPA but is covered by other laws.

The specific information that we collect, use and disclose relating to a California resident covered by the CCPA will vary based on our relationship with that individual (e.g., an employee versus an individual submitting a request for information on our website).

In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months (note that our employees are considered consumers and some of the information collected applies to employees):

Category	Examples	Collected
A. Identifiers	A real name, postal address, online identifier, Internet Protocol address, email address, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A 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, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Yes
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, pregnancy or childbirth and related medical conditions), veteran or military status.	Yes
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing histories.	Yes
E. Biometric information	Voiceprints if a voicemail message is recorded.	Yes
F. Internet or other similar network activity	Browsing history, information on a consumer's interaction with a website or advertisement.	Yes
G. Geolocation data	Physical location or movements.	Yes
H. Sensory data	Audio, electronic, visual, or similar information.	Yes

I. Professional or employment-related information	Current or past job history or performance evaluations.	Yes
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, or student financial information.	Yes
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, behavior, attitudes, abilities, and aptitudes.	Yes

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete as an employee, or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our website.

Disclosures of Personal Information for a Business Purpose

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers, Affiliates and Internet cookies

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders.
- To provide, support, personalize, and develop our website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your social media experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our website, third-party sites, and via email (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose of the disclosure and

requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. We share your personal information with the following categories of third parties:

- Service providers.
- Our affiliates.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

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. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources of 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.
- The specific pieces of personal information we collected about you (also called a data portability request).

Deletion Request Rights

You have the right to request that we delete any of your personal information that we have collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception 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, 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. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
4. Comply with a legal obligation.
5. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by:

- Calling 216-825-4000 / Emailing: jgeers@Ancora.net / or Visiting www.ancora.net

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. To designate an authorized agent, contact us for instructions by using one of the above contact methods.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, and
- 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. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 45 additional days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide may only cover the 12-month period preceding the Request's receipt. If we are unable to satisfy your Request, or a part of your Request, we will explain why. We do not charge a fee to process or respond to Requests.

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.

Changes to Our Privacy Notice

We reserve the right to amend this Privacy Notice at our discretion and at any time. When we make changes to this Privacy Notice, we will post the updated Notice on the Website and update the Notice's effective date. **Your continued use of our website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this Notice, our Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us by:

- Calling 216-825-4000 / Emailing: jgeers@Ancora.net / or Visiting www.ancora.net