

Privacy Notice For California Consumers

Last updated: January 1, 2020

This notice contains disclosures required by the California Consumer Privacy Act (“CCPA”), is only relevant to residents of California, and applies only to the collection or other use of “personal information” that is subject to the CCPA.

Information We Collect. In the past 12 months, we have collected the following categories of personal information about California consumers:

- Identifiers
 - This includes information containing a real name, alias, email address, postal address, Internet Protocol (IP) address, account name, Social Security number, driver’s license number, passport number, or other similar personal identifiers.
- Other personal information categories, as listed in the California Customer Records statute
 - This includes a signature, physical characteristics or description, telephone number, education, employment, or employment history
- Protected classification characteristics under California or federal law
 - This includes information pertaining to age (40 years or older), race, citizenship, marital status, sex, veteran or military status.
- Commercial information
 - This includes account activity, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Biometric information
 - Examples of biometric information include fingerprints, faceprints, voiceprints, and iris or retina scans.
- Internet or other similar network activity
 - Examples of this information include browsing history, search history, information on a consumer’s interaction with a website (“cookies”), application, or advertisement.
- Professional or employment-related information
 - Examples of this information includes current or past job history or performance evaluations.
- Non-public education information
 - Such information includes education records directly related to a student maintained by an educational institution or party acting on its behalf.

We do not knowingly collect or solicit personal information from anyone under the age of 18.

We collect personal information from the following categories of sources:

- Your communications with us;
- Service providers, including, but not limited to: administrators, banks, auditors, law firms, employment agencies; and
- Government entities.

Use of Personal Information. We may use the personal information we collect for one or more of the following purposes:

- Providing you with information about our products and services;
- Providing performance and other updates;
- One or more of the following business purposes:
 - Performing services (for us or our service provider) such as account servicing, processing orders and payments, and analytics;
 - Legal compliance; and
 - Internal operations.

Sharing Personal Information. We may provide personal information to:

- Service providers, including but not limited to: administrators, banks, auditors, law firms, employment agencies; and
- Legal or government regulatory authorities as required by applicable law.

In the past 12 months, we have not sold any personal information we collect to third parties, and we have shared the categories of personal information we collect only as set forth above.

Rights of California Consumers. The CCPA provides a California consumer the following rights, subject to certain exceptions and limitations:

- The right to request (a) the categories and specific pieces of personal information we collect, use, disclose, and sell about you, (b) the categories of sources from which we collected your personal information, (c) our purposes for collecting or selling your personal information, (d) the categories of your personal information (if any) that we have either sold or disclosed for a business purpose, and (e) the categories of third parties with which we have shared personal information;
- For certain categories of personal information, the right to request a list of what personal information (if any) we disclosed to third parties for their own direct marketing purposes in the past 12 months and the names and addresses of those third parties;
- The right to request that we delete the personal information we have collected from you or maintain about you;
- The right to opt out of our sale(s) (if any) of your personal information; and
- The right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA.

You may submit requests relating to your exercise of rights under the CCPA to us: via phone at 212-232-1420 or via email at InvestorRelations@capstoneco.com.