



Privacy Notice for California Residents

Last Updated: June 30, 2023

This Privacy Notice for California Residents (the “**Privacy Notice**”) supplements the information contained in our Privacy Policy and applies solely to individual residents of the State of California from whom we collect personal information (“**consumers**” or “**you**”).

This Privacy Notice describes how we collect, use, disclose, and otherwise process personal information of individual residents of the State of California, either online or offline, within the scope of the California Consumer Privacy Act of 2018 (“**CCPA**”) as amended by the California Privacy Rights Act.

Unless otherwise expressly stated, all terms in this Privacy Notice have the same meaning as defined in our Privacy Policy or as otherwise defined in the CCPA.

Under the CCPA, “**personal information**” is information that identifies, relates to, or could reasonably be linked with a particular California resident or household. Personal information does not include publicly available information that is from federal, state, or local government records, such as professional licenses and public real estate/property records. The definition of publicly available information also includes information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media, or certain information disclosed by a consumer and made available if the consumer has not restricted the information to a specific audience. The CCPA also exempts certain types of information such as certain medical information and consumer credit reporting information.

Collection and Use of Personal Information

We collect personal information from and about consumers for a variety of purposes. The personal information that we collect about a specific California consumer will depend on, for example, our relationship or interaction with that individual.

In the last 12 months, we have collected the following categories of personal information, as defined by the CCPA. The examples of personal information provided for each category are taken from the CCPA and are included to help you understand what the categories mean. The examples are not meant to indicate what we actually collect or disclose, and more information about our specific practices can be found in our Privacy Policy.

- **Identifiers:** A real name, postal address, internet protocol address, email address, account name, or other similar identifiers.
- **Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)):** A real name, signature, social security number, physical characteristic 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, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
- **Protected classification characteristics under California or federal law:** Age (40 years or older), national origin, marital status, gender, veteran, or military status.

- **Commercial information:** Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Biometric information:** Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, scans of the hands or face geometry, voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
- **Internet or other electronic network activity information:** Browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement.
- **Geolocation data:** Precise physical location or movements.
- **Audio and visual information:** Audio, electronic, visual, thermal, olfactory, or similar information.
- **Employment information:** Professional or employment-related information, such as work history and prior employer information from background checks, resumes, and personnel files.
- **Education information:** Education information is defined as information that is not publicly available or personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).
- **Inferences drawn from other personal information:** Profile reflecting an individual's preferences, characteristics, and predispositions.
- **Sensitive personal information:**
 - Social Security number, driver's license, state identification card, or passport number;
 - Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account;
 - Precise geolocation;
 - Racial or ethnic origin, religious or philosophical beliefs, citizenship, or immigration status;
 - The contents of mail, email, and text messages unless we are the intended recipient of the communication;
 - Biometric information processed to uniquely identify an individual; and
 - Health information, sexual orientation.

Sources of Collecting Personal Information

We collect this information from a variety of sources including, but not limited to:

- Directly from you or other individuals acting on your behalf, through, for example, physical (e.g., paper application), audible (e.g., phone), and electronic (e.g., website, social media) sources.
- Indirectly from you, such as from observing your actions on our website.
- Records and copies of your correspondence (including email addresses), if you contact us in relation to our products or services.
- Your responses to surveys that we might ask you to complete for research or marketing purposes.
- Details of transactions you carry out on our website and fulfillment of your service orders.

Purposes for Collecting Personal Information

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

- Deliver and maintain products and services;
- Establish and maintain your account and billing records;
- Measure credit and payment risk;
- Provide account-related services and information;
- Help you with service and technical support issues or questions;
- Manage and protect our networks, services, employees, and users;
- Detect and prevent fraud;

- Help us improve and personalize your service;
- Research, develop and market new products and services;
- Authenticate your identity;
- Deliver personalized content and offerings to you; or
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

Disclosure of Personal Information

As explained in the “**Does Arena One Share My Information**” section of our Privacy Policy, we share your personal information with the following categories of CCPA third parties: (i) vendors and service providers, including for data analytics, marketing and advertising our products and services to you; (ii) third parties integrated into our services; (iii) third parties as required by law and similar disclosures; (iv) third parties in connection with a merger, sale, or asset transfer; and (v) other third parties for whom we have obtained your permission to disclose your personal information.

You also have the right to limit the sensitive personal information about you to only that which is necessary to provide the goods or perform the services reasonably expected by an average consumer who requests those goods or services. You can limit our use and disclosure of your sensitive personal information by following the directions provided under “**How to Exercise Your Privacy Rights**” below.

Selling or Sharing for Targeted Advertising

We do not rent, sell, or share your personal information with non-affiliated companies for their direct marketing purposes, unless we have your permission. We have no actual knowledge that we sell or share personal information of California consumers 16 years of age and younger.

Your Privacy Choices

If you are a California consumer, you have the right to request that we:

1. Disclose to you the following information covering the 12-month period prior to your request (“Right to Know”):
 - a. The categories of personal information we collected about you and the categories of sources from which we collected the personal information;
 - b. The business or commercial purpose for collecting personal information about you;
 - c. The categories of third parties to whom we disclosed personal information about you, and the categories of personal information disclosed; and
 - d. The specific pieces of personal information we collected about you.
2. Delete personal information we collected from you (“Right to Delete”).
3. Correct inaccurate personal information that we maintain about you (“Right to Correct”).

In addition, you have the right to be free from discrimination by a business for exercising your CCPA privacy rights.

There may be information we will not return in response to your access request, such as information that would affect the privacy of others or interfere with legal requirements. Similarly, there may be reasons why we cannot comply with your deletion request, such as the need to keep your personal information in order to provide you service or to fulfill a legal obligation. Additionally, in certain circumstances, we may not collect sufficient identifiers to match information in our records with your request.

How to Exercise Your Privacy Rights

To submit a request to exercise one of the privacy rights identified above, please submit a request by:

- Emailing us at legal@arenaone.io
- Calling us at 888.543.2000

Only the California consumer, or a person that is authorized to act on your behalf, may make a request related to your personal information. *In any of these cases, the request must be verifiable before we can fulfill such request.* Verifying a request will require sufficient information for us to reasonably verify your identity or that an individual is a person authorized to act on the California consumer's behalf.

Authorized Agents

In certain circumstances, you are permitted to use an authorized agent (as that term is defined by the CCPA) to submit requests on your behalf through the designated methods set forth in this Privacy Notice where we can verify the authorized agent's authority to act on your behalf.

For requests to know, delete, or correct personal information, we require the following for verification purposes:

- a. a power of attorney valid under the laws of California from you or your authorized agent; or
- b. sufficient evidence to show that you have:
 1. provided the authorized agent signed permission to act on your behalf; and
 2. verified your own identity directly with us pursuant to the instructions set forth in this Privacy Notice; or directly confirmed with us that you provided the authorized agent permission to submit the request on your behalf.

For requests to opt-out of personal information "sales" or "sharing", as those terms are defined in the CCPA, we require a signed permission demonstrating your authorized agent has been authorized by you to act on your behalf.

Updates to This CA Notice

We may update this Privacy Notice from time to time. When we make changes to this Privacy Notice, we will change the "**Last Updated**" date at the beginning of this Privacy Notice. All changes shall be effective from the date last updated unless otherwise stated.

Contact Us

If you have any questions regarding our privacy practices as it relates to this Privacy Notice for California Residents, please contact us via email at legal@arenaone.io with the subject line, "CCPA Policy".