

CCPA Privacy Policy

Privacy Statement - California

To comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws this privacy policy is for California residents and supplements the information contained in the [Privacy Policy](#) of H+K Strategies (collectively, “we,” “us,” or “our”). This policy applies to visitors and users who are residents of the State of California (“consumers” or “you”). Any terms defined in the CCPA have the same meaning when used in this policy.

The types of personal information that we may process includes the following as described more fully in the CCPA (Cal. Civ. Code § 1798.140(o)) and corresponding to the following subsections therein: (A) Identifiers, (B) Personal information categories listed in the California Consumer Records statute (Cal. Civ. Code § 1798.80(e)), (C) Protected classification characteristics under California or federal law, (D) Commercial information, (F) Internet or other similar network activity, (I) Professional or employment-related information, (J) Non-public educational information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)), and (K) Inferences drawn from other personal information. We may use your personal information to provide you with information that you’ve requested; to responds to specific inquiries; to provide you with a better way of accessing information on our website; or in consideration of a job application which you’ve submitted.

You are entitled to ask: (i) for copies of your personal information we hold and how that information is processed; (ii) to have any inaccuracies in your personal information corrected; (iii) for any personal information which is processed by automated means to be made available to you in a structured and commonly-used machine readable format (when technically feasible); and (iv) to have your personal information erased, or for our use to be restricted. Instructions on how you may exercise any of your privacy rights can be found below.

Categories of personal information we collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). Chart A below, listing types of personal information, corresponds to the subsections that can be found in the CCPA (Cal. Civ. Code § 1798.140(o)). Within the last 12 months, we have collected the following categories of personal information from consumers, or have received the following categories of personal information from other businesses:

Chart A:

Category of Personal Information	Examples (Note: These are examples of the category and not all of this data is collected)
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.

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, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
I. Professional or employment-related information.	Current or past job history or performance evaluations.
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, student identification codes, student financial information, or student disciplinary records.
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Personal information does not include publicly available information from government records, de-identified or aggregated consumer information.

Sources, purposes and sharing of personal information

We may disclose your personal information to other group companies, affiliates and third parties to help us process your personal information for the purposes set out in this policy. When we disclose personal information for a business purpose, we enter a contract that describes the purpose of the processing and prevents the recipient from retaining, using or disclosing the personal information for any purpose other than performing the contract.

In all of the categories in Chart A above, which corresponds to the subsections of the CCPA (Cal. Civ. Code § 1798.140(o)), we collect personal information about consumers to provide marketing, advertising and analytics services. For example, this may include helping clients deliver online advertising campaigns to their customers, helping clients identify new customers that are similar to their existing customers, and helping clients understand more about their customers so that they can develop better products and advertising campaigns with those customers in mind.

In all of the categories in Chart A above, we collect or receive the categories of personal information

from (i) Consumers directly, or (ii) Service Providers and/or business partners who have collected the personal information directly from Consumers.

Chart B:

Category of Personal Information	Categories of third parties with whom the Personal Information is shared
A. Identifiers.	Service Providers and business partners to perform function in connection with the purposes set out in this policy.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Not shared.
C. Protected classification characteristics under California or federal law.	Not shared.
D. Commercial information.	Not shared.
F. Internet or other similar network activity.	Not shared.
I. Professional or employment-related information.	Service Providers and business partners to perform function in connection with the purposes set out in this policy.
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)).	Service Providers and business partners to perform function in connection with the purposes set out in this policy.
K. Inferences drawn from other personal information.	Service Providers and business partners to perform function in connection with the purposes set out in this policy.

Your Rights

The CCPA provides Consumers (California residents) with specific rights regarding their personal information, these are explained below.

California Civil Code Section 1798.83 permits Consumers to request information regarding the disclosure of their personal information by us to a third party for the third party's direct marketing purposes.

California Civil Code Section 1798.100(a) provides Consumers with the right to request that we disclose to the personal information that we retain about them.

California Civil Code Section 1798.105(a) provides Consumers the right to request that we delete any personal information about them that we have collected.

California Civil Code Section 1798.110 provides Consumers with the right to request that we, as a business that collects personal information, disclose information about the personal information we have collected.

The CCPA provides consumers (California residents) with rights regarding their personal information as described above, these are further explained below.

Access to your Personal Information and Data Portability

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 request, we will disclose to you:

- The categories of personal information we collected about you.
- For each category of personal information we collected about you:
 - o the categories of sources from which this was collected.
 - o Our business or commercial purpose for collecting that personal information.
 - o Our business or commercial purpose for selling or disclosing that personal information.

- The specific pieces of personal information we collected about you.

For data portability requests, we will provide your personal information in a format that is readily useable and should allow you to transmit the information from us to another entity.

Deletion Request

You have the right to request that we delete any of your personal information that we collected from you and retained. We may deny your deletion request if it is necessary for us or our service providers to retain your personal information, based upon allowed exceptions.

Once we receive and verify your request, and no exception applies, we will delete and direct our service providers to delete your personal information as requested. We will contact you to confirm the deletion and the manner in which it was deleted.

Non-Discrimination

We will not discriminate against you for exercising any of your rights under the CCPA.

Exercising Access, Data Portability, and Deletion Rights

To exercise the rights described above please submit your request to us by either:

- Toll-free number: (833) 255-2717
- Email: Privacy@hkstrategies.com

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information.

For the purpose of verification, we may request further information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. We cannot respond to your request or provide you with personal information if we cannot reasonably

verify your identity or authority to make the request.

There is no charge for exercising your request, however, if it is excessive, repetitive, or manifestly unfounded we may charge a reasonable fee based upon the administrative costs of providing the information to you or taking the action requested. We may also refuse to act on the request and will notify you of the reason for refusing the request.

Response Timing

Upon receiving a verifiable consumer request, we aim to deliver the required information within 45 calendar days. Where we require more time (up to a further 45 calendar days), we will inform you of the reason and extension period.

How to contact us

If you wish to exercise any of your rights in relation to your personal information or if you have any queries about how we use your personal information, please let us know by contacting us at the following address:

Privacy@hkstrategies.com

Changes to this Privacy Policy

We review this privacy policy on a regular basis to ensure that it is up-to-date with our use of your personal information, and compliant with applicable data protection laws.

We reserve the right, at our discretion, to revise this privacy policy at any time. The updated privacy policy will be posted on our website. You are encouraged to review this privacy policy from time to time.