

## California Consumer Privacy Act Notice

This California Consumer Privacy Act Notice for California Consumers (“**CCPA Privacy Notice**”) supplements the Privacy Statement of FocusVision Worldwide, Inc. and its global affiliates and subsidiaries, including Decipher, Inc. , Kinesis Survey Technologies, LLC , and Revelation, Inc. (collectively, “FVW,” “we,” “us,” and “our”) and applies solely to California consumers. The California Consumer Privacy Act (“**CCPA**”) affords California consumers certain rights over their personal information (subject to certain exceptions). This CCPA Privacy Notice outlines those rights and explains how such rights may be exercised. This CCPA Privacy Notice also summarizes our data collection and sharing practices, as required by the CCPA. Terms used but not defined shall have the meaning ascribed to them in the CCPA. You may download a copy of this CCPA Privacy Notice [here](#).

### **1. What Is Information is Covered by this CCPA Privacy Notice?**

This CCPA Privacy Notice relates to our collection, use and disclosure of California consumers’ personal information. “**Personal information**” generally 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. For a list of the categories of personal information that we collect, please see section 7 (Summary of Collection, Use, and Disclosure of Personal Information) below.

### **2. How Do We Collect Personal Information?**

For a list of the categories of sources from which we may collect personal information, please see Section 7 (Summary of Collection, Use and Disclosure of Personal Information) below.

### **3. How Do We Use Personal Information?**

We may use your personal information for a variety of business and commercial purposes. “**Business purpose**” generally refers to the use of personal information for our operational purpose. “**Commercial purpose**” refers to when we use personal information to advance our commercial or economic interests including, for example, by encouraging others to purchase our products and services. For a more fulsome explanation of how we may use each category of personal information, please see section 7 (Summary of Collection, Use and Disclosure of Personal Information) below.

### **4. Who Do We Share Personal Information With?**

We may share your personal information with the third parties described below. For a more detailed summary of the categories of third parties we may share your personal information with, please see Section 7 (Summary of Collection, Use and Disclosure of Personal Information) below.

- a) **Service Providers.** We may share your personal information with third parties who work on behalf of, or with, us such as vendors, processors, suppliers, agents and representatives (collectively, “**Service Providers**”). Service Providers assist us with a variety of functions including, but not limited to, sending out marketing communications, assisting with advertising and related analytics, conducting research or surveys, sending regular mail and e-mail, processing credit card payments, and administering contests, surveys or promotions.
- b) **Affiliated Companies.** We may share personal information among and between FocusVision Worldwide, Inc. and its global affiliates and subsidiaries, including Decipher, Inc., Kinesis Survey Technologies, LLC, and Revelation, Inc.
- c) **Disclosures Under Special Circumstances.** We may disclose your personal information to third parties: (i) where we have a good faith belief that such disclosure is necessary to meet any applicable law, regulation, legal process or other legal obligation; (ii) when we believe disclosure is necessary to protect or prevent harm or financial loss; or (iii) to detect, investigate and help prevent security, fraud or technical issues.

- d) **Corporate Transactions.** We may transfer your personal information in the event we sell or transfer, or are considering selling or transferring, all or a portion of our business or assets.
- e) **Clients.** If you are selected for or participate in a research study, we may disclose your information to the third-party or third-parties that hired us to assist with the research study (“Clients”) as well as other companies designated by the Clients.

**5. Do We Sell Personal Information?**

We do not sell personal information to third-parties. We also do not share any personal information with third-parties for the third-parties’ marketing purposes.

**6. Do We Collect the Personal Information of Children?**

We do not knowingly collect or store any personal information from anyone under the age of 16. If we become aware that we have collected or stored personal information from an individual under age 16, we will remove his or her personal information from our files. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to [privacy@focusvision.com](mailto:privacy@focusvision.com).

**7. Summary of Collection and Disclosure of Personal Information.**

When you visit our website, participate in a research project, or consider or purchase our services, we collect personal information. The table below summarizes our collection and sharing practices relating to personal information, including with respect to personal information we have collected, used and disclosed in the preceding 12 months.

Category of Personal Information	Source of Personal Information	Purposes for Collection/Potential Uses of Personal Information	Categories of Third-Parties With Whom Information Was Shared
<p><b>Identifiers</b></p> <p>Representative Data Elements: real name; alias; postal address; telephone numbers; unique personal identifier; online identifier; Internet Protocol Address; email address; account name, social security number, driver’s license number, passport number and other similar identifiers</p>	<p>Consumers, Clients</p>	<ul style="list-style-type: none"> <li>• Confirming your identity</li> <li>• Providing, developing, maintaining, and improving our products and Services (e.g. collecting information requested by Clients as part of a research study, evaluating the performance of our staff, assessing the quality of our products and Services, and helping us improve our websites and processes)</li> <li>• Processing and fulfilling a request or other transaction submitted to us</li> <li>• Processing payments</li> <li>• Completing contracts as well as disclosures or other documents required by law.</li> <li>• Allowing creation of and access to an online customer portal</li> <li>• Communicating with you (e.g. for customer service purposes, to discuss billing or</li> </ul>	<p>Computer Software Companies, Technology Service Providers, Professional Service Firms, Data Management and Storage Companies, Clients</p>

		<p>payments, or to notify you about past-due payments)</p> <ul style="list-style-type: none"> <li>• Marketing and advertising our products and Services</li> <li>• For research and analytical purposes (e.g. identifying trends and effectiveness of marketing campaigns)</li> <li>• Complying with our legal obligations</li> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	
<p><b>Any categories of personal information described in subdivision (e) of Section 1798.80</b></p> <p>Representative Data Elements: 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, employment history, financial account number or any other financial information, medical information, or health insurance information</p>	<p>Consumers, Clients</p>	<ul style="list-style-type: none"> <li>• Confirming your identity</li> <li>• Providing, developing, maintaining, and improving our products and Services (e.g. collecting information requested by Clients as part of a research study, evaluating the performance of our staff, assessing the quality of our products and Services, and helping us improve our websites and processes)</li> <li>• Processing and fulfilling a request or other transaction submitted to us</li> <li>• Processing payments</li> <li>• Completing contracts as well as any disclosures or other documents required by law.</li> <li>• Allowing creation of and access to an online customer portal</li> <li>• Communicating with you (e.g. for customer service purposes, to discuss billing or payments, or to notify you about past-due payments)</li> <li>• Marketing and advertising our products and Services</li> <li>• For research and analytical purposes (e.g. identifying trends and effectiveness of marketing campaigns)</li> <li>• Complying with our legal obligations</li> </ul>	<p>Computer Software Companies, Technology Service Providers, Professional Service Firms, Data Management and Storage Companies, Clients</p>

		<ul style="list-style-type: none"> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	
<p><b>Characteristics of protected classifications under California or federal law</b></p> <p>Representative Data Elements: 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)</p>	Consumers, Clients	<ul style="list-style-type: none"> <li>• Confirming your identity</li> <li>• Providing, developing, maintaining, and improving our products and Services (e.g. collecting information requested by Clients as part of a research study, evaluating the performance of our staff, assessing the quality of our products and Services, and helping us improve our websites and processes)</li> <li>• Processing and fulfilling a request or other transaction submitted to us</li> <li>• Processing payments</li> <li>• Completing contracts as well as any disclosures or other documents required by law.</li> <li>• Allowing creation of and access to an online customer portal</li> <li>• Communicating with you (e.g. for customer service purposes, to discuss billing or payments, or to notify you about past-due payments)</li> <li>• Marketing and advertising our products and Services</li> <li>• For research and analytical purposes (e.g. identifying trends and effectiveness of marketing campaigns)</li> <li>• Complying with our legal obligations</li> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	Computer Software Companies, Technology Service Providers, Professional Service Firms, Data Management and Storage Companies, Clients
<p><b>Commercial Information</b></p> <p>Representative Data Elements: records of personal property, products or services purchased, obtained, or</p>	Consumers, Clients	<ul style="list-style-type: none"> <li>• Providing, developing, maintaining, and improving our products and Services (e.g. collecting information requested by Clients as part of a research study, evaluating the performance of our staff, assessing the quality of our products and Services, and helping us improve our websites and processes)</li> <li>• Processing and fulfilling a request or other transaction submitted to us</li> </ul>	Computer Software Companies, Technology Service Providers, Professional Service Firms, Data Management and Storage

<p>considered, or other purchasing or consuming histories or tendencies</p>		<ul style="list-style-type: none"> <li>• Communicating with you (e.g. for customer service purposes, to discuss billing or payments, or to notify you about past-due payments)</li> <li>• For research and analytical purposes (e.g. identifying trends and effectiveness of marketing campaigns)</li> </ul>	<p>Companies, Clients</p>
<p><b>Internet or other electronic network activity information</b></p> <p>Representative Data Elements: browsing history; search history; and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement</p>	<p>Consumers, Clients</p>	<ul style="list-style-type: none"> <li>• Providing, developing, maintaining, and improving our products and Services (e.g. collecting information requested by Clients as part of a research study, evaluating the performance of our staff, assessing the quality of our products and Services, and helping us improve our websites and processes)</li> <li>• Completing contracts as well as any disclosures or other documents required by law.</li> <li>• Allowing creation of and access to an online customer portal</li> <li>• Communicating with you (e.g. for customer service purposes, to discuss billing or payments, or to notify you about past-due payments)</li> <li>• Marketing and advertising our products and Services</li> <li>• For research and analytical purposes (e.g. identifying trends and effectiveness of marketing campaigns)</li> <li>• For our business operations</li> <li>• Complying with our legal obligations</li> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	<p>Computer Software Companies, Technology Service Providers, Data Management and Storage Companies.</p>
<p><b>Audio, electronic visual, thermal, olfactory of similar information</b></p> <p>Representative Data Elements: information from voicemail</p>	<p>Consumers, Clients</p>	<ul style="list-style-type: none"> <li>• Confirming your identity</li> <li>• Providing, developing, maintaining, and improving our products and Services (e.g. collecting information requested by Clients as part of a research study, evaluating the performance of our staff, assessing the quality of our products and Services, and helping us improve our websites and processes)</li> </ul>	<p>Computer Software Companies, Technology Service Providers, Professional Service Firms, Data Management and Storage</p>

<p>messages and/or recorded phone calls, video surveillance at our classes</p>		<ul style="list-style-type: none"> <li>• Processing and fulfilling a request or other transaction submitted to us</li> <li>• Communicating with you (e.g. for customer service purposes, to discuss billing or payments, or to notify you about past-due payments)</li> <li>• For research and analytical purposes (e.g. identifying trends and effectiveness of marketing campaigns)</li> <li>• Complying with our legal obligations</li> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	<p>Companies, Clients</p>
<p><b>Professional or employment-related information</b></p> <p>Representative Data Elements: job history, current employer, prior employers, dates of employment, salary and bonus information</p>	<p>Consumers</p>	<ul style="list-style-type: none"> <li>• Providing, developing, maintaining, and improving our products and Services (e.g. collecting information requested by Clients as part of a research study, evaluating the performance of our staff, assessing the quality of our products and Services, and helping us improve our websites and processes)</li> <li>• Processing and fulfilling a request or other transaction submitted to us</li> <li>• Complying with our legal obligations</li> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	<p>Computer Software Companies, Technology Service Providers, Professional Service Firms, Data Management and Storage Companies, Clients</p>
<p><b>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))</b></p> <p>Representative Data Elements: information regarding whether a consumer is or</p>	<p>Consumers</p>	<ul style="list-style-type: none"> <li>• Providing, developing, maintaining, and improving our products and Services (e.g. collecting information requested by Clients as part of a research study, evaluating the performance of our staff, assessing the quality of our products and Services, and helping us improve our websites and processes)</li> <li>• Processing and fulfilling a request or other transaction submitted to us</li> <li>• Complying with our legal obligations</li> <li>• Protecting our legitimate business interests and legal rights</li> </ul>	<p>Computer Software Companies, Technology Service Providers, Data Management and Storage Companies, Clients</p>

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**8. Your Rights:** Subject to certain exceptions, the CCPA affords you the following rights:

**a) Right to Know/Access Personal Information Collected, Disclosed, or Sold.**

You have the right to request that we disclose the following information for the 12-month period preceding your request:

- (1) The categories of personal information that we have collected about that consumer;
- (2) The categories of sources from which the personal information was collected;
- (3) The business or commercial purpose for collecting or selling the personal information;
- (4) The categories of third parties with whom we share the personal information; and/or
- (5) The specific pieces of personal information we have collected about that consumer.

**b) Right to Request Deletion of Personal Information**

You have the right to request that we delete any personal information about the consumer that we have collected or that we maintain.

**c) Right to Not Be Discriminated Against**

You have the right not to receive discriminatory treatment from us for the exercise of the privacy rights conferred by CCPA and listed in this CCPA Privacy Notice.

**9. How to Exercise Your CCPA Rights**

**a) Submitting a Request to Know or Request to Delete.** You may submit a Request to Know or a Request to Delete by contacting us at this toll-free number, 877-787-1253, or by using this interactive webform.

**b) Verification Methods.** Once you submit a request, we will verify that you are the consumer to which the request pertains by matching data points that you provide with information we maintain. Depending on the type of request you submit, we will attempt to match either two or three of the data points you provided. If we are unable to verify your request with the data points you provided, we may reach out to you for additional information to verify your request.

**10. How to Authorize an Agent to Exercise Your Rights**

California consumers have the right to designate an authorized agent to exercise their CCPA rights. To designate an authorized agent, you must either provide the agent with an executed power of attorney or provide the authorized agent with written permission, signed by you, to exercise your CCPA rights. The agent must also be registered with the California Secretary of State.

**11. Individuals with Disabilities**

If you have a disability and need access to our CCPA Privacy Notice in a different format, please contact us at 877-787-1253 or [privacy@focusvision.com](mailto:privacy@focusvision.com).

**12. Metric Requirements.** As of January 1, 2021, Company will include the following metrics in this CCPA Privacy Notice for the previous calendar year:

- a) The number of Requests to Know that the Company received, complied with, in whole or in part, and denied;

- b) The number of Requests to Delete that the Company received, complied with, in whole or in part, and denied;
- c) The number of Requests to Opt-Out that the Company received, complied with, in whole or in part, and denied; and
- d) The median number of days within which the Company substantively responded to Requests to Know, Requests to Delete, and Requests to Opt-Out.

### **13. Contact Information**

If you have any questions or concerns about our privacy policies and practices, please review our Privacy Statement which is available at <https://www.focusvision.com/privacy-statement/> or contacts us via email at [privacy@focusvision.com](mailto:privacy@focusvision.com).

**Last Updated Date:** July 01, 2020