

## BrandXads California Privacy Notice

**Effective Date:** March 3, 2021

*This notice reflects our good faith understanding of the law and our data practices as of the date posted (set forth above), but the CCPA's implementing regulations are not yet final and there remain differing interpretations of the law. Accordingly, we may from time-to-time update information in this and other notices regarding our data practices and your rights, modify our methods for responding to your requests, and/or supplement our response to your requests, as we continue to develop our compliance program to reflect the evolution of the law and our understanding of how it relates to our data practices.*

This California Privacy Notice (“**Notice**”) applies to “Consumers” as defined by the California Consumer Privacy Act (“**CCPA**”) as a supplement to trusted-caregivers.com (“**Company**” “**us**” “**we**” “**our**”) other privacy policies or notices. In the event of a conflict between any other Company policy, statement or notice and this Notice, this Notice will prevail as to California Consumers and their rights under the CCPA. Please see also any general privacy policy or notice posted or referenced on our websites, apps, products, or services including, without limitation, <https://trusted-caregivers.com/privacy>.

This Notice covers our collection, use, disclosure, and sale of California Consumers’ “Personal Information” (“**PI**”) as defined by the CCPA, except to the extent such PI is exempt from the notice obligations of the CCPA for the twelve months preceding the Effective Date. This Notice also covers rights California Consumers have under the CCPA, as well other notices to Californians required by other laws. The description of our data practices in this Notice, as required by the CCPA, covers only calendar year 2019 and will be updated annually. Our practices in calendar year 2020 may differ, however, if materially different from this Notice we will provide pre-collection notice of the current practices, which may include reference to our general privacy policy or other applicable privacy notices, which will reflect current practices.

Consistent with the CCPA, job applicants, current and former employees and independent contractors (“**Personnel**”), and subjects of certain business-to-business communications acting solely in their capacity as representatives of another business, are not considered “Consumers” for purposes of this California Privacy Notice or the rights described herein. However, our Personnel may obtain a separate privacy notice that is applicable to them by contacting our Human Resources department [here](#) Publicly available information is also not treated as PI under the CCPA, so this notice is not intended to apply to that data and your Consumer privacy rights do not apply to that data.

To aid in readability, in some places we have abbreviated or summarized CCPA terms or language, but a full copy of the CCPA is available [here](#) for your review, and in some places in this Notice we cite and/or link to specific CCPA sections for your reference. Terms defined in the CCPA that are used in this Notice shall have the same meaning as in the CCPA.

You can click on the following blue links to navigate to the different sections in this Notice.

## Table of Contents

1. [PI We Collect](#)
  - (A) [Sources of PI](#)
  - (B) [Use of PI](#)
2. [Sharing of PI](#)
  - (A) [Disclosures](#)
  - (B) [Sales](#)
3. [California Privacy Rights](#)
  - (A) [The Right to Know](#)
    - i. [Information Rights](#)
    - ii. [Obtaining Copies of PI](#)
  - (B) [Do Not Sell](#)
  - (C) [Delete](#)
  - (D) [Non-Discrimination and Financial Incentive Programs](#)
  - (E) [Authorized Agents](#)
  - (F) [Limitation of Rights](#)
4. [Additional California Notices](#)
  - (A) [Third Party Marketing and Your California Privacy Rights](#)
  - (B) [Online Privacy Practices](#)
  - (C) [Tracking and Targeting](#)
  - (D) [California Minors](#)
5. [Contact Us](#)

## 1. PI WE COLLECT

We collect the following types of PI about California Consumers, and use and share it as follows:

Category of PI	[Examples of PI] [Specifics]	Sources of PI	Business or Commercial Purposes for PI Collection	Category of third parties with which the PI is shared, if shared.
<p><b>1. Identifiers</b> (as defined in CCPA §1798.140(o)(1)(A))</p>	<p>This may include but is not limited to: unique personal identifier, online identifier, Internet Protocol address, or email address.</p>	<p>Consumers directly</p>	<p>Auditing, security, debugging, processing interactions and transactions, performing services, quality assurance</p>	<p>Service providers such as fraud prevention companies; and third party partners, such as advertisers</p>
<p><b>2. Personal Characteristics or Traits</b> (as defined in CCPA §1798.140(o)(1)(C))</p>	<p>This may include, but is not limited to: sex, marital status, religion, veteran status, familial status, race, disability, gender identity, and creed.</p>	<p>Consumers directly</p>	<p>Auditing, security, debugging, processing interactions and transactions, performing services, quality assurance</p>	<p>Service providers such as fraud prevention companies; and third party partners, such as advertisers</p>
<p><b>3. Internet Usage Information</b> (as defined in CCPA §1798.140(o)(1)(F))</p>	<p>This may include, but is not limited to: browsing history, search history, and information regarding your interaction with an Internet Web site, application, or advertisement.</p>	<p>Consumers directly</p>	<p>Auditing, security, debugging, processing interactions and transactions, performing services, quality assurance</p>	<p>Service providers such as fraud prevention companies; and third party partners, such as advertisers</p>

As permitted by applicable law, we do not treat deidentified data or aggregate consumer information as PI and we reserve the right to convert, or permit others to convert, your PI into deidentified data or aggregate consumer information. We have no obligation to re-identify such information or keep it longer than we need it to respond to your requests. This helps us practice data minimization, which we consider to be a privacy best practice consistent with our mission to respect our customers.

[\[Return to navigation\]](#)

#### **A. Sources of PI.**

We may collect your PI directly from you. For more specifics tied to each category of PI, see the chart above.

#### **B. Use of PI.**

Generally, we collect, retain, use and share your PI to provide you services and as otherwise related to the operation of our business. For more specific detail on our collection of PI, see the chart above at [PI We Collect](#). For more detail on our disclosures and sale of PI, see the next section [Sharing of PI](#).

As more fully detailed in the chart above, we may collect, use and share the PI we collect for one or more of the following business purposes”:

- **Processing Interactions and Transactions** (§1798.140(d)(4));
- **Managing Interactions and Transactions** (§1798.140(d)(1));
- **Performing Services** (§1798.140(d)(5));
- **Research and Development** (§1798.140(d)(6));
- **Quality Assurance** (§1798.140(d)(7));
- **Security** (§1798.140(d)(2));
- and **Debugging** (§1798.140(d)(3)).

Subject to restrictions and obligations of the CCPA, our vendors may also use your PI for some or all of the above listed business purposes.

We may collect, use and share your PI for commercial purposes such as for interest based advertising and sharing PI in a manner that is deemed a sale under the CCPA.

In addition, we may collect, use and share your PI as required or permitted by applicable law.

For more specifics tied to each category of PI, see the chart above.

For more information on how to exercise your do not sell rights, click [here](#).

For more information on your “do not sell rights”, see [Section 3.B](#) below.

[\[Return to navigation\]](#)

**2. Sharing of PI.**

We may share PI with our service providers, other vendors (including those that facilitate interest-based and other advertising and marketing), affiliates, and/or third parties to which we sell your PI, including without limitation during calendar year 2019 as follows:

Category of PI	Shared with Third Parties?	Categories of Third Parties
<b>1. Identifiers</b> (as defined in CCPA §1798.140(o)(1)(A))	Yes	Service providers, such as fraud prevention companies; and third party partners, such as advertisers
<b>2. Personal Characteristics or Traits</b> (as defined in CCPA §1798.140(o)(1)(C)) (as defined in CCPA §1798.140(o)(1)(B))	Yes	Service providers such as fraud prevention companies; and third party partners, such as advertisers
<b>3. Internet Usage Information</b> (as defined in CCPA §1798.140(o)(1)(F))	Yes	Service providers such as fraud prevention companies; and third party partners, such as advertisers

**A. Disclosures for Business Purposes.**

We may share your PI (as described above in [PI We Collect](#) with our service providers and other qualified vendors for a business purpose], including [in the calendar year 2019 as follows:

Category of PI	Disclosed for a Business Purpose?	Business Purposes for Disclosures	Categories of Recipients of Business Purpose Disclosure
<b>1. Identifiers</b> (as defined in CCPA §1798.140(o)(1)(A))	Yes	Managing Interactions and Transactions (§1798.140(d)(1));	Client / Advertiser

<b>2. Personal Records</b>  (as defined in CCPA §1798.140(o)(1)(B))	No		
<b>3. Consumer Characteristics</b>  (as defined in CCPA §1798.140(o)(1)(C))	No		
<b>4. Customer Account Details / Commercial Information</b>  (as defined in CCPA §1798.140(o)(1)(D))	No		
<b>5. Biometric Information</b>  (as defined in CCPA §1798.140(o)(1)(E))	No		
<b>6. Internet Usage Information</b>  (as defined in CCPA §1798.140(o)(1)(F))	No		
<b>7. Geolocation Data</b>  (as defined in CCPA §1798.140(o)(1)(G))	No		
<b>8. Sensory Data</b>	No		

(as defined in CCPA §1798.140(o)(1)(H))			
<b>9. Professional or Employment Information</b>  (as defined in CCPA §1798.140(o)(1)(I))	No		
<b>10. Non-public Education Records</b>  (as defined in CCPA §1798.140(o)(1)(J))	No		
<b>11. Inferences from PI Collected</b>  (as defined in CCPA §1798.140(o)(1)(K))	No		

Notwithstanding anything to the contrary in our other privacy notices, we typically restrict use of your PI that is governed by the CCPA’s Consumer rights provisions and is shared with our vendors to business purposes, or we treat such disclosures as sales of your PI subject to your Do Not Sell rights.

In addition, if you direct us to share PI we may, and that is not a sale. Also, disclosures amongst the entities that constitute Company as defined above are not a sale

**B. Sales.**

We may sell your PI (as the term “sell” is defined by the CCPA). The PI sold in the calendar year 2019 may include:

Category of PI	Sold?	Purposes for Selling	Categories of Recipients of PI Sold
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<p><b>1. Identifiers</b></p> <p>(as defined in CCPA §1798.140(o)(1)(A))</p>	<p>Yes</p>	<p>Marketing</p>	<p>Service providers, such as advertisers</p>
<p><b>2. Personal Records</b></p> <p>(as defined in CCPA §1798.140(o)(1)(B))</p>	<p>No</p>		
<p><b>3. Consumer Characteristics</b></p> <p>(as defined in CCPA §1798.140(o)(1)(C))</p>	<p>Yes</p>	<p>Marketing</p>	<p>Service Providers, such as advertisers</p>
<p><b>4. Customer Account Details / Commercial Information</b></p> <p>(as defined in CCPA §1798.140(o)(1)(D))</p>	<p>No</p>		
<p><b>5. Biometric Information</b></p> <p>(as defined in CCPA §1798.140(o)(1)(E))</p>	<p>No</p>		
<p><b>6. Internet Usage Information</b></p> <p>(as defined in CCPA §1798.140(o)(1)(F))</p>	<p>Yes</p>	<p>Marketing</p>	<p>Service Providers, such as advertisers</p>
<p><b>7. Geolocation Data</b></p>	<p>No</p>		



(as defined in CCPA §1798.140(o)(1)(G))			
<b>8. Sensory Data</b> (as defined in CCPA §1798.140(o)(1)(H))	No		
<b>9. Professional or Employment Information</b> (as defined in CCPA §1798.140(o)(1)(I))	No		
<b>10. Non-public Education Records</b> (as defined in CCPA §1798.140(o)(1)(J))	No		
<b>11. Inferences from PI Collected</b> (as defined in CCPA §1798.140(o)(1)(K))	No		

For more information on how to exercise your do not sell rights, click [here](#).

While there is not yet a consensus, data practices of third party cookies and tracking devices associated with our websites and mobile apps may constitute a “sale” of your PI as defined by the CCPA. You can exercise control over browser-based cookies by adjusting the settings on your browser. In addition, third party tools enable you to search for and opt-out of some of these devices, such as the Ghostery browser plug-in available at <https://www.ghostery.com/>. We also list cookies and provide access to their privacy information and, if available, opt-out programs [here](#). Further, you can learn more about your choices regarding certain kinds of online interest-based advertising [here](#). We do not represent that these third party tools, programs or statements are complete or accurate.

[\[Return to navigation\]](#)

### **3. CALIFORNIA PRIVACY RIGHTS.**

The CCPA is a new law and there remain differing interpretations of it and the regulations that implement it. Accordingly, we may from time-to-time update information in our notices regarding our data practices and your rights, modify our methods for you to make and for us to respond to your requests, and/or supplement our response(s) to your requests, as we continue to develop our compliance program to reflect the evolution of the law and our understanding of how it relates to our data practices.

We provide California Consumers the privacy rights described in this section. You have the right to exercise these rights via an authorized agent who meets the agency requirements of the CCPA and related regulations. As permitted by the CCPA, any request you submit to us is subject to an identification process and residency verification (“**Verifiable Consumer Request**”). We will not fulfill your CCPA request unless you have provided sufficient information for us to reasonably verify you are the Consumer about whom we collected PI. Please follow submission instructions and respond to any follow up inquiries we may make.

Some PI we maintain about Consumers is not sufficiently associated with enough PI about the Consumer for us to be able to verify that it is a particular Consumer’s PI when a Consumer request that requires verification pursuant to the CCPA’s verification standards is made (e.g., clickstream data tied only to a pseudonymous browser ID). As required by the CCPA we do not include that PI in response to those requests. If we cannot comply with a request, we will explain the reasons in our response. You are not required to create an account with us to make a Verifiable Consumer Request. We will use PI provided in a Verifiable Consumer Request only to verify your identity or authority to make the request and to track and document request responses, unless you also gave it to us for another purpose.

We will make commercially reasonable efforts to identify Consumer PI that we collect, process, store, disclose and otherwise use and to respond to your California Consumer privacy rights requests. We will typically not charge a fee to fully respond to your requests; provided, however, that we may charge a reasonable fee, or refuse to act upon a request, if your request is excessive, repetitive, unfounded or overly burdensome. If we determine that the request warrants a fee, or that we may refuse it, we will give you notice explaining why we made that decision. You will be provided a cost estimate and the opportunity to accept such fees before we will charge you for responding to your request.

Your California Consumer privacy rights are as follows:

**A. The Right to Know.**

**i. Information Rights.**

You have the right to send us a request, no more than twice in a twelve-month period, for any of the following for the period that is twelve months prior to the request date:

- The categories of PI we have collected about you.
- The categories of sources from which we collected your PI.
- The business or commercial purposes for our collecting or selling your PI.
- The categories of third parties to whom we have shared your PI.
- The specific pieces of PI we have collected about you.
- A list of the categories of PI disclosed for a business purpose in the prior 12 months, or that no disclosure occurred.
- A list of the categories of PI sold about you in the prior 12 months, or that no sale occurred. If we sold your PI, we will explain:
  - The categories of your PI we have sold.
  - The categories of third parties to which we sold PI, by categories of PI sold for each third party.

To make a request, please send an email to [privacy@trusted-caregivers.com](mailto:privacy@trusted-caregivers.com) with the subject: “Privacy Information Request” and include your name and phone number or call us at 844-933-1161. You must provide your Full Name, Email, & Phone number for us to start the verification process, we also may require residency verification. For your specific pieces of information, as required by the CCPA, we will apply the heightened verification standards set forth in subsection (ii) below.

Please note that PI is retained by us for various time periods, so we may not be able to fully respond to what might be relevant going back 12 months prior to the request.

**ii. Obtaining Copies of PI.**

You have the right to make or obtain a transportable copy, no more than twice in a twelve-month period, of your PI that we have collected and are maintaining. To make a request, please send an email to [privacy@trusted-caregivers.com](mailto:privacy@trusted-caregivers.com) with the subject: “Privacy Information Request” or call us at 844-933-1161. You must provide your Full Name, Email, & Phone number for us to start the verification process, we also may require residency verification.

Please note that PI is retained by us for various time periods, so we may not be able to fully respond to what might be relevant going back 12 months prior to the request.

## **B. Do Not Sell.**

While there is not yet a consensus, data practices of third party cookies and tracking technologies associated with our websites and mobile apps may constitute a “sale” of your PI as defined by the CCPA. You can exercise control over browser-based cookies by adjusting the settings on your browser, and mobile devices may offer ad limitation choices. In addition, third party tools may enable you to search for and opt-out of some of these trackers, such as the Ghostery browser plug-in available at <https://www.ghostery.com/>. Further, you can learn more about your choices regarding certain kinds of online interest-based advertising in our [privacy policy](#), Section 4, Your Choices. We do not represent that these third-party tools, programs or statements are complete or accurate, clearing cookies or changing settings may affect your choices and you may have to opt-out separately via each browser and other device you use.

If you are 16 years of age or older, you have the right to direct us to not sell your PI. To be added to our "Do not sell" list, please send an email to [privacy@trusted-caregivers.com](mailto:privacy@trusted-caregivers.com) with the subject: “Do Not Sell” and or call us at 844-933-1161. You must provide your Email. However, you may alternatively exercise more limited control of your PI by instead exercising one of the following options:

- [Unsubscribe](#)
- [Consumer Right Request](#)
- [Do Not Sell](#)

We do not knowingly sell the PI of Consumers we know are under 16 unless we receive an opt-in from the Consumer who is at least 13 but under 16, or from the parent or guardian of a Consumer younger than 13. Consumers who opt-in to PI sales may opt-out at any time. If you think we may have unknowingly collected PI for sale of yourself or of your child under the age of 13, or if you are at least 13 but under 16, exercising the opt-out will stop our selling of the PI.

## **C. Delete.**

Except to the extent we have a basis for retention under CCPA, you may request that we delete your PI that we have collected directly from you and are maintaining. Our retention rights include, without limitation, to complete transactions and service you have requested or that are reasonably anticipated, for security purposes, for legitimate internal business purposes, including maintaining business records, or to comply with law. Note also that we are not required to delete your PI that we did not collect directly from you. To make a request, please send an email to [privacy@trusted-caregivers.com](mailto:privacy@trusted-caregivers.com) with the subject: “PI Deletion Request” and include your name and phone number or call us at 844-933-1161. You must provide your Full Name, Email, & Phone number for us to start the verification process, we also may require residency verification.

**D. Non-Discrimination and Financial Incentive Programs.**

We will not discriminate against you in a manner prohibited by the CCPA because you exercise your CCPA rights. However, we may charge a different price or rate, or offer a different level or quality of good or service, to the extent that doing so is reasonably related to the value of the applicable data. In addition, we may offer you financial incentives for the collection, sale and retention and use of your PI as permitted by the CCPA that can, without limitation, result in reasonably different prices, rates, or quality levels. The material aspects of any financial incentive will be explained and described in its program terms. Please note that participating in incentive programs is entirely optional, you will have to affirmatively opt-in to the program and you can opt-out of each program (i.e., terminate participation and forgo the ongoing incentives) prospectively by following the instructions in the applicable program description and terms. We may add or change incentive programs and/or their terms by posting notice on the program descriptions and terms linked to above so check them regularly.

**E. Authorized Agents.**

Your California Consumer privacy rights are described below. To make a request, please email us at [privacy@trusted-caregivers.com](mailto:privacy@trusted-caregivers.com) or call us toll-free at 844-933-1161. We will take appropriate steps to confirm the identity of a Consumer making a request for purposes of verifying the authenticity of the request. You may be required to provide certain PI to allow us to verify that you are the Consumer about whom the request is being made. If you request that we provide you with specific pieces of information about you, we will apply heightened verification standards. An authorized agent may submit a request on behalf of a Consumer if the Consumer has provided the authorized agent with power of attorney in accordance with California law; alternatively, the agent must (1) present verifiable written authorization from the Consumer that the agent has the Consumer's permission to submit the request; and (2) independently verify the agent's own identity with us.

**F. Limitation on Rights.**

Notwithstanding anything to the contrary, we may collect, use and disclose your PI as required or permitted by applicable law and this may override your CCPA rights. In addition, we need not honor any of your requests to the extent that doing so would infringe upon our or any other person or party's rights or conflict with applicable law.

[\[Return to navigation\]](#)

**4. ADDITIONAL CALIFORNIA NOTICES.**

In addition to CCPA rights, certain Californians are entitled to certain other notices, including:

**A. Third Party Marketing and Your California Privacy Rights.**

California's "Shine the Light" law permits California residents to request certain information regarding our disclosure of PI to third parties for their own direct marketing purposes.

**Separate from your CCPA "Do Not Sell" rights you have the following additional rights regarding disclosure of your information to third parties for their own direct marketing purposes:**

We do not share personal information as defined by California Civil Code § 1798.83 ("Shine the Light law") with third parties for their direct marketing purposes without either obtaining your consent or giving you the ability to opt-out. To opt-out of future sharing with third parties for their direct marketing purposes, check [here](#). If you are a California resident, you may request information about our compliance with the Shine the Light law by contacting us at: [privacy@trusted-caregivers.com](mailto:privacy@trusted-caregivers.com) or by sending a letter to 60 Railroad Place, Suite 203, Saratoga Springs, NY 12866, (Attention: Legal Counsel). Any such request must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address or mail address.

**As these rights and your CCPA rights are not the same and exist under different laws, you must exercise your rights under each law separately.**

**B. Online Privacy Practices.**

For more information on our online practices and your California rights specific to our online services see our online [Privacy Policy](#). Without limitation, Californians that visit our online services and seek or acquire goods, services, money or credit for personal, family or household purposes are entitled to the following notices of their rights:

**C. Tracking and Targeting.**

When you visit our online services, we and third parties may use tracking technologies to collect usage information based on your device for a variety of purposes, including serving you advertising, based on your having visited our services or your activities across time and third-party locations. Some browsers may enable you to turn on or off a so-called "Do Not Track" signal. Because there is no industry consensus on what these signals should mean and how they should operate, we do not look for or respond to "Do Not Track" signals. For more information on tracking and targeting and your choices regarding these practices, see our online [Privacy Policy](#).

**D. California Minors.**

Although our online service(s) are intended for an audience over the age of 18, any California residents under the age of eighteen (18) who have registered to use our online services, and who posted content or information on the service, can request removal by contacting us [here](#), detailing where the content or information is posted and attesting that you posted it. We will then make reasonably good faith efforts to remove the post from prospective public view or anonymize it, so the minor cannot be individually identified to the extent required by applicable law. This removal process cannot ensure complete or comprehensive removal. For instance, third parties may have republished or archived content by search engines and others that we do not control.

[\[Return to navigation\]](#)

**5. CONTACT US.**

For more information on your California privacy rights contact us at 844-933-1161 or email us [here](#). Or, write to us at: 1216 Broadway, Floor 2, New York City, NY 10001