**California Privacy Policy**

This California Privacy Policy applies only to California consumers (“**you**” or “**your**”) and supplements the Privacy Policy of CAPSTONE Identity Theft Protection by Frontline, hereinafter CAPSTONE ID (“**Capstone ID**” or “**we**”). The California Consumer Privacy Act of 2018 (“**CCPA**”) and the California Privacy Rights Act of 2020 (“**CPRA**”), collectively referred to as “California Consumer Privacy Laws”, provide California consumers with specific rights regarding their personal information. This California Privacy Policy describes your privacy rights under the California Consumer Privacy Laws, explains how you may exercise your privacy rights, and provides an overview on the types of personal information we collect.

**Scope**

CAPSTONE ID may have collected the following categories of CCPA Personal Information from consumers within the last 12 months:

|  |  |
| --- | --- |
| **Category** | **Examples** |
| 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, or passport number. |
| 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, medical information, or health insurance information. |
| Internet or other similar network activity | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. |
| Geolocation data | Physical location |
| Professional or employment-related information | Current or past job history or performance evaluations |
| Education information | Current or past education history |

CCPA Personal Information does not include:

1.     Publicly available information from government records,

2.     Information excluded from the CCPA’s scope, such as:

* Protected Health Information under HIPAA, information subject to the California Confidentiality of Medical Information Act, or clinical trial data; or
* “Business to business” information, which is information related to communications or transactions between a business collecting the information and a consumer who is acting on behalf of another business where the communications or transaction relate solely to an exchange of products or services between the two businesses.

**Collection of Your CCPA Personal Information.**

CAPSTONE ID collect’s each of the categories of CCPA Personal Information listed above in one or more of the following ways:

* When you contact us (i.e. from forms you complete).
* Automatically when you use CAPSTONE ID services.
* From other sources, including the Internet and other publicly available sources and databases, data aggregators, marketing companies, and other third parties.

**How We Use Your CCPA Personal Information.**

CAPSTONE ID may use or disclose each of the categories of CCPA Personal Information described above for one or more of the following business purposes:

* **Information.** CAPSTONE ID may use your CCPA Personal Information to verify your identity or provide you the information, products, and services that you request.
* **Experience.** CAPSTONE ID may use your CCPA Personal Information to personalize and enhance your experience.
* **Business Transaction:** If CAPSTONE ID is exploring or go through a business transition, such as a merger, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, securities offering, or sale of all or a portion of CAPSTONE ID assets.
* **Legal Purposes:** CAPSTONE ID will use your CCPA Personal Information when we think it is necessary to investigate or prevent actual or expected fraud, criminal activity, injury or damage to us or others; when otherwise required by law, regulation, subpoena, court order, warrant or similar legal process; or if necessary to assert or protect our rights or assets.

**Sharing Your CCPA Personal Information.**

CAPSTONE ID may share your CCPA Personal Information with the following categories of third parties for a business purpose:

* **Internally** (i.e. with our group companies and affiliates).
* **Vendors:** CAPSTONE ID may share your CCPA Personal Information with our vendors (including third-party hosting providers) that provide services on our behalf, such as for email marketing, advertising, promotions, newsletters, notices and other communications, or that assist us in monitoring, improving, and hosting services.
* **Business Transaction:** If CAPSTONE ID is exploring or go through a business transition, such as a merger, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy, securities offering, or sale of all or a portion of CAPSTONE ID assets.
* **Legal Purposes:** CAPSTONE ID may disclose your CCPA Personal Information when it thinks it is necessary to investigate or prevent actual or expected fraud, criminal activity, injury or damage to us or others; when otherwise required by law, regulation, subpoena, court order, warrant or similar legal process; or if necessary to assert or protect our rights or assets.

**Security Measures.**

CAPSTONE ID restricts access to your personal information to employees who we have determined need it in order to provide products or services to you. Further, CAPSTONE ID provides thorough training to its employees to safeguard customer personal information. We maintain strict physical, electronic and procedural safeguards to protect your personal information from unauthorized access by third parties.

**Rights and Choices under the CCPA.**

* **Right to Access.**You have the right to access your CCPA Personal Information that we may collect or retain about you. If requested, we shall provide you with a copy of your CCPA Personal Information that we collect as permitted by the CCPA/CPRA.
* **Right to Know**. You have the right to request that we disclose the following about your CCPA Personal Information, as defined by the CCPA/CPRA:

o        The specific CCPA Personal Information we may collect;

o        The categories of CCPA Personal Information we may collect;

o        The categories of sources from which we may collect your CCPA Personal Information;

o        The business purpose(s) for collecting or sharing your CCPA Personal Information;

o        The categories of CCPA Personal Information we may disclose for business purposes; and

o        The categories of third parties to whom we may share your CCPA Personal Information.

* **Right to Deletion.**

o        You have the right to request that we delete any of your CCPA Personal Information that CAPSTONE ID collected from you and retained, subject to certain exceptions. Any requests for deletion should be directed at privacy@capstonetheft.com.

o        CAPSTONE ID may deny your deletion request for reasons permitted by the CCPA. (i.e. if the information is excluded from the CCPA or does not constitute CCPA Personal Information).

* **Right to Opt Out.**You have the right to opt out of the sale or sharing of personal information. If we sell any of your personal information, you have the right, at any time, to tell us not to sell your personal information. At the time this Privacy Policy was last updated, we do not sell any personal information. You also have the right to request that we do not share your personal information.
* **Right to Correct.**You have the right to request the correction of any personal information we maintain about you.
* **Right to Limit Use or Disclosure of Sensitive Personal Information (“SPI”).** You have the right to limit the use and disclosure of your SPI, if we are using your SPI beyond what is reasonable and proportionate to provide the requested goods or services.
* **Response Timing and Format.** Once verified the request is from a California consumer, CAPSTONE ID will try to respond within 45 days. If we need more time, we will tell you in writing why and how much longer we need, either by mail or electronically (based on your choice).
* **Non-Discrimination.** CAPSTONE ID will not discriminate against you for choosing to exercise any of your CCPA rights, including with respect to any CAPSTONE ID services.
* **Alternative Format.** To obtain this Privacy Policy in an alternative format please contact CAPSTONE ID at 866-358-3314.

**Changes and Updates to this Privacy Policy.**

CAPSTONE ID may occasionally update this CCPA Privacy Policy. Your continued use of the Website constitutes Your agreement to this CCPA Privacy Policy and any updates.

**Contacting Us.**

If you have any questions or comments about this Supplement, including how we collect and use your CCPA Personal Information or your choices and rights regarding such use, or if you wish to exercise your rights under California law, please contact us by either:

By Mail**:**

Attn: Capstone ID Customer Privacy

2401 Sardis Rd N

Charlotte, NC 28227

By Phone:

866-358-3314

By Email:

[**privacy@capstonetheft.com**](mailto:privacy@capstonetheft.com)

By Internet Form:

Using the Personal Data Request Form on the Capstone ID website.