

Effective Date: September 6, 2022

Date Last Reviewed: September 6, 2022

### California Resident Privacy Statement

This CR Access Consulting Privacy Statement for California Residents (Statement) supplements the [CR Access Consulting Privacy Policy](https://www.cr-access-llc.com/privacy-policy/) published on <https://www.cr-access-llc.com/privacy-policy/> and other company privacy notices that reference this Statement. It applies only to California residents and addresses personal information we collect online and offline. This statement does not apply to:

- i. employment-related personal information collected from employees, job applicants, directors, contractors, or similar individuals (who will receive a separate privacy notification);
- ii. personal information reflecting a written or verbal business-to-business communication (B2B personal information); or
- iii. other personal information exempt or not governed by the California Consumer Privacy Act of 2018 and its implementing regulations (the “CCPA”).

This California Consumer Privacy Statement uses certain terms that have the meaning given to them in the CCPA.

## 1. Notice of Collection and Use of Personal Information

We may collect the following categories of personal information about you:

<b>Identifiers</b>	identifiers such as a real name, alias, signature, physical characteristics, or description, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, IP address, email address, account name, Social Security number, driver’s license number, passport number, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information; and other similar identifiers
--------------------	--

<b>Protected Classifications</b>	characteristics of protected classifications under California or federal law, such as race, color, national origin, religion, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, medical condition, ancestry, genetic information, disability, citizenship status, and military and veteran status
<b>Biometric Information</b>	
<b>Online Activity</b>	Internet and other electronic network activity information, including, but not limited to, browsing history, search history, digital communications with company, and information regarding your interaction with websites, applications or advertisements
<b>Geolocation Data</b>	
<b>Sensory Information</b>	audio, electronic, visual, thermal, olfactory, and similar information
<b>Employment Information</b>	professional or employment-related information
<b>Education Information</b>	education information that is not publicly available 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)
<b>Inferences</b>	inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We may use such categories of personal information for certain commercial purposes and business purposes specified under the CCPA, including as described in this table:

<b>Purposes</b>	<b>Categories of Personal Information</b>
To provide products and services	Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information and Inferences
To fulfill the reason you provided the information	Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information and Inferences
To provide you with support and to respond to your requests or inquiries, including to investigate and address any concerns and monitor and improve our responses	Identifiers; Protected Classifications; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information and Inferences
To operate, evaluate and improve our business (including developing new products and services; enhancing and improving our products and services; managing our communications; analyzing our products, services, and communications; and performing accounting, auditing, data analytics and other internal functions)	Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information and Inferences

<p>To undertake internal research for technological development and demonstration</p>	<p>Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information and Inferences</p>
<p>To protect against, identify and prevent cybersecurity and other security events, espionage, fraud, and other unlawful activity, claims and other liabilities; and prosecuting those responsible</p>	<p>Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information and Inferences</p>
<p>To comply with and enforce applicable legal requirements, contractual obligations, relevant industry standards and our policies</p>	<p>Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information and Inferences</p>
<p>To respond to law enforcement requests</p>	<p>Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information and Inferences</p>
<p>To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred</p>	<p>Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information and Inferences</p>

## 2. Our Prior Collection, Use and Disclosure of Personal Information

We may have collected and used your personal information, as described in section 1 above, during the 12-month period prior to the effective date of this California Consumer Privacy Statement. For the personal information collected during that timeframe, we describe below: (a) the categories of sources from which we may have obtained the personal information, (b) the categories of third parties with whom we may have shared the information, (c) the categories of personal information we may have sold, if any, and (d) the categories of personal information we may have disclosed for a business purpose.

### A. Sources of Personal Information

We may have obtained personal information about you from various sources, including as described below.

<b>Categories of Sources of Data Collection</b>	<b>Categories of Personal Information</b>
Directly from you (such as when you provide identifiers to gain access to one of our facilities)	Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information
Indirectly from you (such as when our security cameras capture your image)	Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information
From your devices (such as when you browse or use our website)	Identifiers; Online Activity; Geolocation Data

Vendors who provide services on our behalf	Identifiers; Online Activity; Geolocation Data; Sensory Information
Our customers and business partners (such as subcontractors and suppliers)	Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information
Government agencies, law enforcement, courts, and regulators	Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information; Inferences
Cybersecurity information sharing resources	Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information
Social networking services	Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information
Public databases	Identifiers; Protected Classifications; Biometric Information; Sensory Information; Employment Information

B. Sharing of Personal Information

We may have shared your personal information with certain categories of third parties, including as described below.

<b>Categories of Third Parties</b>	<b>Categories of Personal Information</b>
Vendors who provide services on our behalf	Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information; Inferences
Our customers and business partners (such as subcontractors and suppliers)	Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information; Inferences
Participants in cyber security information resources (when related to a cyber threat indicator)	Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Employment Information; Education Information; Inferences
Government agencies, law enforcement, courts, and regulators	Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information; Inferences
Third parties in the event of a corporate transaction, such as an acquisition	Identifiers; Protected Classifications; Biometric Information; Online Activity; Geolocation Data; Sensory Information; Employment Information; Education Information; Inferences

### C. Sale of Personal Information

We do not sell your personal information in exchange for monetary compensation or other valuable consideration.

### D. Disclosure of Personal Information for a Business Purpose

We may have disclosed to third parties - for a business purpose - certain categories of personal information, including: Identifiers, Protected Classifications, Biometric Information, Online Activity, Geolocation Data, Sensory Information, Employment Information, Education Information, and Inferences.

## 3. Your California Consumer Privacy Rights

If you are a California resident, the CCPA provides you with specific rights regarding your personal information. This section describes your CCPA rights and explains how to exercise those rights. We do not provide these rights for employment-related, or B2B personal information.

### *Rights to Access to Specific Personal Information*

You have the right under the CCPA to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. If you submit a verifiable request for any of the following data, consistent with the CCPA, we will disclose the following:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we disclosed your personal information for a business purpose, the categories of personal information that were disclosed for such purpose.

*Note: Because we do not sell personal information, we have not listed the CCPA rights to request CCPA personal information categories that we have sold or the purposes for which we have sold data.*

### ***Right to Request Deletion***

You also may have the right to request that we delete your personal information that we have collected from you and retained. Unless one of the exceptions set forth in the CCPA applies, once we confirm your verifiable request, we will delete your personal information and direct our service providers to do the same.

**How to Submit a Request.** To submit an access or deletion request, you must submit a verifiable request to us using one of the contact means identified in the ***How To Contact Us*** section below. Only you, or someone legally authorized to act on your behalf, may make a verifiable request for your personal information. You may only submit a request for access or data portability twice within a 12-month period. We do not typically charge a fee to process a verifiable request. If we determine that your request warrants a fee due to its nature, we will explain our rationale for assessing a fee and provide you with a cost estimate before completing your request.

**Verifying Requests.** To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. In addition, if you ask us to provide you with specific pieces of personal information, we will require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request. If you designate an authorized agent to make an access or deletion request on your behalf, we may require you to provide the authorized agent written permission to do so and verify your own identity directly with us.

**Non-Discrimination.** If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us.

**Updates to This Statement.** We may update this Statement periodically and without prior notice to you to reflect changes to our personal information practices. We will post the updated version and change the date(s) at the top of the Statement to reflect when it was most recently reviewed and/or updated.

## How To Contact Us

If you have any questions or comments about this Statement or the ways in which we collect and use your information described here, wish to exercise your choices and rights you may have, or want to request this notice in an alternate form, please contact us using one of the methods described below:

[Info@CR-Access-LLC.com](mailto:Info@CR-Access-LLC.com)

### **CR Access Consulting, LLC**

*Attn: Privacy Manager*

283 Constitution Drive

One Columbus Center, Suite 610

Virginia Beach, VA 23462

757.687.8166

**CCPCA Consumer Request Webform:** <https://www.cr-access-llc.com/online-dsar-page/>