

## Privacy Policy for California Residents

This Privacy Policy for California Residents conforms to the California Consumer Privacy Act of 2018 (the “CCPA”) and forms part of our Privacy Policy. It applies to the handling of personal information of our consumers who are residents of California (“consumers” or “you”).

### 1. Information We Collect

We collect information that identifies, relates to, describes, references, and is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information from our consumers within the last twelve (12) months and will collect the following categories of personal information:

<b>Category</b>	<b>Examples</b>
A. Identifiers.	A real name, postal address, postal code, social security number, driver’s license number, passport number, date of birth, age, sex, email address, and 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, address, telephone number, passport number, driver's license number, education, employment history, bank account number, and any other financial information.
C. Protected classification characteristics under California or federal law.	Age (40 years or older), sex, and other protected classification characteristics.

We obtain the categories of personal information listed above from the sources indicated below:

- Directly from you. For example, from your business card: Categories A and B
- Directly from you. For example, from your job application form and interview and during your employment: Categories A through C

### 2. Use of Personal Information

We may use the categories of personal information from the list above, for one or more of the following business purposes indicated below:

- For communicating with business partners and customers in business negotiations, contract negotiations, etc.: Categories A and B
- For recruitment and employment management: Categories A through C
- For carrying out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and fulfillment: Categories A through C
- For responding to law enforcement requests and as required by applicable law, court order, or governmental regulations: Categories A through C

We will not collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes without providing you notice thereof.

### **3. Sharing or Disclosure of Personal Information**

We may share or disclose your personal information to a third party for business purposes or commercial purposes. When we disclose personal information to service providers for business purposes or commercial purposes, we enter a contract that describes such purposes and requires the service providers to both keep that personal information confidential and not use it for any purpose except for performing the contract.

In the preceding twelve (12) months, we have shared or disclosed the following categories of personal information from the above list to the following categories of third parties for business purposes or commercial purposes:

- Affiliates and service providers involved in the telecommunications business: Categories A through C

### **4. Sales of Personal Information**

We have not sold any personal information in the preceding twelve (12) months.

### **5. Your Rights and Choices under the CCPA**

The CCPA provides consumers (California residents) with specific rights regarding personal information. This Section 5 describes your CCPA rights and explains how to exercise those rights.

## (1) Access Right to Specific Information

You have the right to request that we disclose certain information to you about our collection, sharing, disclosure or use of your personal information over the past twelve (12) months from the time of your request. Once we receive and confirm your verifiable consumer request, we will disclose to you the following information:

- 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 or selling that personal information;
- The categories of third parties with whom we share or sell that personal information;
- The categories of personal information sold by each third party who sold personal information;
- The categories of personal information disclosed for business purposes or commercial purposes; and
- The specific pieces of personal information we collected about you.

Please note that we have not sold any personal information in the preceding twelve (12) months.

## (2) Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the rights of other consumers to exercise their free speech rights, or exercise other rights provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with legal obligations; or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### (3) Opt-Out Rights

We have not sold and will not sell any personal information collected from consumers.

### (4) Non-Discrimination

We will not discriminate against California residents for exercising any of their rights under the CCPA. Moreover, unless permitted by the CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## (5) Exercising Access and Deletion Rights

To exercise the access and deletion rights described above, please submit a verifiable consumer request to us by contacting us in the manner set forth in Section 6 (Contact Us).

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. You may also make a verifiable consumer request on behalf of your minor child.

The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative (e.g. a copy of your passport, residence certificate, etc.); and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond thereto.

## **6. Contact Us**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your information described above, or wish to exercise your CCPA rights, please do not hesitate to contact us at:

- Calling us at 800-528-3588; or
- [customerservice@ilacorp.com](mailto:customerservice@ilacorp.com).

Privacy Policy Last Updated and Effective: July 1, 2020