Epraise Website Privacy Policy for California Residents

Effective Date: December 12, 2024

A. This **Privacy Policy for California Residents** supplements the information contained in Epraise's Website Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Identifiers

B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))

Consumer Privacy Act of 2018, as amended by the California Consumer Privacy Rights Act of 2020 (collectively the "CCPA") and any terms defined in the CCPA have the same meaning when used in this Policy. This Policy provides information about our use of data collected through our public website located at https://www.epraise.co.uk (our "Website"), not about our processing of your Personal Information in connection with services that we provide through our platforms and related websites and apps (collectively, our "Services").

In our processing of personal information in connection with our Services, we act as a 'service provider' (as this term is defined in the CCPA), and in that context our customers act as businesses on behalf of which we process data for purposes of the Services. When we act as a service provider our processing of data is governed by our Data Processor Addendum or other data processing terms in place between Epraise and each customer. For more information on our processing as a data processor, please contact the educational or other institution that collected your Personal Information in connection with our Services.

Information We Collect

Our Website collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("**personal information**").

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
    - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA), clinical trial data, or other qualifying research data;

- personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, our Website has collected the following categories of personal information from consumers within the last twelve (12) months:

Category	**Examples**
A. Identifiers.	A real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, address, telephone number, education or employment details. Some personal information included in this category may overlap with other categories.
D. Commercial information.	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
I. Professional or employment-related information.	Current job.

Our Website obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or services you purchase from us.
- Indirectly from you. For example, from observing your actions on our Website.
- From our customers, educational institutions, who have purchased our Services and in connection with which Services we process your Personal Information as a service provider to the related customer.

Use of Personal Information

We may use the following categories of personal information we collect for the purposes set forth in the table below:

Activity	**Categories of Personal Information**
To manage our relationship with you which will include notifying you about changes to our terms of use or our privacy policy.	A. Identifiers B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) D. Commercial Information
To enable you to participate in raffles or complete a survey regarding our services.	A. Identifiers B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) F. Internet and other similar network activity
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	A. Identifiers B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) D. Commercial Information F. Internet and other similar network activity
To deliver relevant content to you.	A. Identifiers B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) F. Internet and other similar network activity
To use data analytics to improve our Website, Services, marketing, customer relationships and experiences.	A. Identifiers B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) D. Commercial Information F. Internet and other similar network activity
To make suggestions and recommendations to you about services that may be of interest to you.	A. Identifiers B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) D. Commercial Information

We will also collect your categories A and B of personal information about you to fulfill or meet the reason you provided the information. For example, if you share your information to request a price quote or ask a question about our services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new service orders.

We will also collect personal information categories A and B to create, maintain, and customize your account with us. We will also collect personal information categories A, B, and F to prevent transactional fraud. Generally, we will collect your personal information for purposes allowed or required by the CCPA.

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

Sharing Personal Information

We may share your personal information by disclosing it to a third-party service provider for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the service provider to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, we have disclosed personal information for a business purpose to the categories of third-party service providers indicated in the chart below.

We do not sell, nor have we sold personal information in the preceding twelve (12) months.

Category of Service Provider	**Personal Information Categories**
Data hosting providers (e.g. Amazon)	A. Identifiers B. California Customer Records personal information categories D. Commercial information F. Internet and other similar network activity
CRM providers (e.g., Salesforce.com)	A. Identifiers B. California Customer Records personal information categories D. Commercial information F. Internet and other similar network activity I. Professional or employment related information

Providers of marketing services (e.g., Pardot or Google)	A. Identifiers B. California Customer Records personal information D. Commercial information F. Internet and other similar network activity
Providers of email services (e.g., Microsoft)	A. Identifiers B. California Customer Records personal information D. Commercial information F. Internet and other similar network activity
Providers of telecommunication services (e.g., Zoom)	A. Identifiers B. California Customer Records personal information D. Commercial information F. Internet and other similar network activity

We will also share your personal information 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 about our Website users is among the assets transferred, or as otherwise permitted or legally required by the CCPA.

Your Rights and Choices

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

This section only applies to you if we collect and process your Personal Information directly and for our own purposes, not on behalf of our Customers for purposes of the Services we provide to you on their behalf. If we collect and/or otherwise process your information this section does not apply to you, and we ask that you please direct any request to exercise your data subject rights to the data owner / controller on behalf of which we process your Personal Information for purposes of our Services.

Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity (see Exercising Your Rights to Know or Delete), we will disclose to you:

- 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.
- If we disclosed your personal information for a business purpose, the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

Right to Delete

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 (the "right to delete"). Once we receive your request and confirm your identity (see Exercising Your Rights to Know, Delete, and Correct) we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a 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.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. 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.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

Right to correct inaccurate personal information

You have the right to request that we correct any inaccuracies in the personal information we hold about you, taking into account the nature of the personal information and the personal information's processing purposes.

Once we receive your request and confirm your identity (see Exercising Your Rights to Know, Delete, and Correct), we will review your request to see if an exception allowing us to process the information applies. We may deny your request if processing the information is necessary for us or our service provider(s) to:

- Ensure security and integrity, if the use is reasonably necessary and proportionate.
- Provide short-term, transient use of the information, including but not limited to non-personalized advertising shown as part of your current interaction with us, if we do not:
- disclose the sensitive personal information to another third party; or
- use it to build a profile about you or otherwise alter your experience outside your current interaction with us.
- Perform services for us, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing, storage, or providing similar services for us.
- Verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us; and
- Improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

As otherwise authorized by regulations the California Privacy Protection Agency may adopt.

Exercising Your Rights to Know, Delete, and Correct

To exercise your rights described above, please submit a request to privacy@epraise.com.

Only you, or someone legally authorized to act on your behalf, may make a request related to your personal information.

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

You may only submit a request twice within a 12-month period. Your 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
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know or delete. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact us at privacy@epraise.com.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, you can export your personal information in CSV or Excel format and transmit the information to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

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

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@epraise.co.uk.

Changes to Our Privacy Policy

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes**.

Contact Information

If you have any questions or comments about this notice, the ways in which Epraise collects and uses your information described here and in our Website Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at privacy@epraise.co.uk.

If you need to access this Policy in an alternative format due to having a disability, please also contact us at privacy@epraise.co.uk or write us at:

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