



## **CITIZEN RELATIONS INC.**

### **PRIVACY POLICY**

Last Updated: July 15, 2020

Citizen Relations Inc. (referred to here as “Citizen” or “we” or “us”) values our customers and respects your privacy.

This Privacy Policy (“Policy”) applies to our offline and online data collection practices, including when you visit our website at <http://www.citizenrelations.com> and any website owned, operated, or controlled by us (collectively the “Site”), contact us by phone or email, or when you engage with us on social media.

We may update this Policy from time to time, as specified in the “Changes to This Privacy Policy” section below.

California state law confers certain rights relating to personal information to its citizens. If you are a California resident please also see our California Privacy Section in this Policy located on **Page 4**.

#### **Your Consent**

You should read this entire Policy before submitting information to us or using our Site. Whenever you submit personal information to us, you consent to the collection, use disclosure, transfer and storage of that information in accordance with this Policy.

We may make full use of all information that is de-identified, aggregated, or otherwise not in personally identifiable form.

#### **Information Collection and Use**

We collect personal information using three methods: 1) from you; 2) using automated technology including when you visit our Site or communicate with us through email; and 3) through third party sources including our service providers.

All personal information will be used as stated in this Policy. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Policy and as otherwise needed to comply with applicable law and internal company policies.

We may combine data collected from these disparate sources unless we tell you otherwise.

We collect, use, and disclose your personal information as described in the chart in Annex 1 below.

## **Retention of Data**

We will retain your personal information (collected through offline and online methods) for as long as it is necessary for the purposes described in this Policy. We will also retain and use your personal information to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

## **Intended Audience of Site; COPPA Compliance**

We are in compliance with the requirements of the Children's Online Privacy Protection Act ("COPPA") and other applicable privacy laws. Our Site, social media accounts and online activities are not directed to children under the age of 16. As a result, our Site does not request or knowingly collect personal data from individuals under the age of 16. If you are not 17 or older, you should not visit or use our Site.

## **Security**

We take reasonable appropriate steps to protect personal data from loss, misuse and unauthorized access, disclosure, alteration or destruction, whether in transmission or storage. Please keep in mind, however, that there is no such thing as perfect security, and no Internet transmission is ever completely secure or error-free

We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology hosted by a third party and then encrypted into our payment gateway provider's database only to be accessible by those authorized with special access rights to such systems, and who are required to keep the information confidential.

## **Cookies and other automated technology**

A "cookie" is a small text file that is placed onto an Internet user's web browser or device and is used to remember and/or obtain information about the user. A "web beacon" is a small object or image that is embedded into a web page, application, or email and is used to track activity. They are also sometimes referred to as pixels and tags.

To find more information about cookies please visit [www.allaboutcookies.org](http://www.allaboutcookies.org). Most browsers are initially set to allow cookies, but also offer the option to restrict cookies or warn you of their use. By disabling cookies, you won't be able to enjoy the convenience provided by our customization.

## **ANALYTICS DISCLAIMER**

We and/or third parties including our service providers on our behalf, may use cookies, web beacons and other similar technology, to collect information for the purposes described in this privacy statement including analytics, and monitoring performance and improvement of our Site (traffic, errors, page load time, popular pages, etc.)

We use Google Analytics to understand how our Site, services, and products perform and how you use them. To learn more about how Google processes your data, please visit <https://www.google.com/policies/privacy/>. To opt out of Google Analytics please visit <https://tools.google.com/dlpage/gaoptout>.

#### Contact for More Information

For information and questions about the use of your personal information or this Policy, you may contact us at [privacycitizen@citizenrelations.com](mailto:privacycitizen@citizenrelations.com).

#### **Changes to This Privacy Policy**

This Policy may be revised from time to time for any reason. If this Policy changes, the revised policy will include a new effective date, and we will notify you of such changes by posting the revised policy on this page. Be sure to check the Policy whenever you submit personal information or use our Site, services, or engage with our social media accounts. The effective date of this Privacy Policy is June 1, 2020.

## **CALIFORNIA CONSUMERS ONLY: Your California Privacy Rights**

The purpose of this section is to inform California residents from whom we may collect personal information about certain rights California affords to its residents with respect to personal information.

### **Right to Know About Personal Information Collection, Disclosed or Sold**

You have the right to request that we disclose to you the following information about personal information we collect from you:

- categories of personal information collected;
- categories of sources of personal information collected;
- the business or commercial purpose for collecting or selling personal information;
- the categories of third parties with whom we share personal information; and
- the specific pieces of personal information we have collected about you over the past 12 months.

You also have a right to know if we have sold or disclosed your personal information for a business purpose over the past 12 months and, if so, the categories of personal information sold or disclosed and the categories of third parties to whom the personal information was sold or disclosed, along with the business or commercial purpose for which the personal information was sold or disclosed.

### **Requests to Know**

To make a request for any of the information set forth above (a “Request to Know”), please submit a verifiable consumer request pursuant to the instructions below. You may only make a Request to Know twice within a 12-month period. We will acknowledge your Request to Know within 10 business days and will attempt to respond substantively within 45-90 days.

The Request to Know must provide sufficient information to allow us to verify that you are the person about whom the personal information was collected, sold or disclosed and must contain sufficient detail to allow us to properly understand, evaluate and respond to your request. If we cannot verify your identity, we will not be able to respond to your request.

You can make a Request to Know the personal information we have about you in the following ways:

- You may make a by sending an email to: [privacycitizen@citizenrelations.com](mailto:privacycitizen@citizenrelations.com).
- You may also make a request by phone by contacting us at 1-855-561-4398

Once we receive your Request to Know, we will begin the process to verify that you are the person that is the subject of the request (the “Verification Process”). The Verification Process consists of matching identifying information provided by you with the information we have about you in our records. You will be asked to provide us with information that will help us to verify your identification.

## **Information Collected**

Within the past 12 months, we have collected the categories of personal information about California consumers as described in [Annex 1](#).

## **Information Sold or Disclosed**

We have not sold any personal information to third parties for a business or commercial purpose in the preceding 12 months.

We have disclosed the following categories of personal information to third parties for a business or commercial purpose in the preceding 12 months (See [Annex 1](#) for further details):

- Internet/Network Activity

For details regarding categories of third parties with whom we have disclosed this information, please see [Annex 1](#).

We do not sell the personal information of minors under 16 years of age.

## **Right to Request Deletion of Personal Information**

You have the right to request the deletion of your personal information collected or maintained by us (“Request to Delete”), subject to certain exceptions permitted by law.

To make a Request to Delete, please submit a verifiable consumer request pursuant to the instructions below. We will acknowledge your Request to Delete within 10 business days and will attempt to respond substantively within 45-90 days.

The Request to Delete must provide sufficient information to allow us to verify that you are the person about whom the personal information was collected, sold or disclosed and must contain sufficient detail to allow us to properly understand, evaluate and respond to your request. If we cannot verify your identity, we will not be able to respond to your request. Additionally, as permitted by law, if the information requested to be deleted is necessary for us to maintain, we will not be able to comply with your request. We will notify you if this is the case.

You can make a Request to Delete in the following ways:

- You may make a request by emailing [privacycitizen@citizenrelations.com](mailto:privacycitizen@citizenrelations.com)
- You may also make a request by phone by contacting us at 1-855-561-4398.

Once we receive your request to delete, we will need to verify that you are the person that is the subject of the request (the “Verification Process”). The Verification Process consists of matching identifying information provided by you with the information we have about you in our records. You should provide us with information that will help us to identify you.

Depending on the sensitivity of the personal information you are requesting to delete, we may need to match identifying information from your request with information our records. If your request to delete involves deleting very sensitive information, we may also need a signed declaration stating that you are the consumer whose personal information is the subject of the request.

We will retain correspondence, documents and information related to any Request to Know, Request to Delete, or Request to Opt-Out for 24 months as required by law.

### **Right to Opt-Out of Sale of Personal Information**

You have the right to opt-out of the sale of your personal information. We do not sell your personal information.

### **Right to Non-Discrimination For Exercising Consumer Privacy Rights**

You have the right not to receive discriminatory treatment for exercising your privacy rights conferred by the California Consumer Privacy Act, including by exercising the rights specified herein.

### **Authorized Agent Information**

You may designate an authorized agent to make a request on your behalf under the California Consumer Privacy Act.

Authorized agents may make requests under the California Consumer Privacy Act on behalf of consumers by emailing [privacycitizen@citizenrelations.com](mailto:privacycitizen@citizenrelations.com). We will require authorized agents to provide proof of the consumer's consent to and designation of the authorized agent for purpose of making the request, and will require authorized agents to provide information necessary to verify the identity of the consumer who is the subject of the request. We may also require that a consumer verify his or her own identity directly with us before we respond to an authorized agent's request.

California Do Not Track Notice: Because there are not yet common, industry accepted "do not track" standards and systems, our Site does not respond to Do Not Track signals. In addition, we may allow third parties to collect personal information from your activity on our Site, as described in the "Information Collection and Use" section above and described in Annex 1.

### **Contact For More Information**

For information and questions about the use of your personal information or this California Consumer Privacy Section or your rights under California law, you may contact us at [privacycitizen@citizenrelations.com](mailto:privacycitizen@citizenrelations.com).

## Changes to This Privacy Policy

This Policy may be revised from time to time for any reason. If this Policy changes, the revised policy will include a new effective date, and we will notify you of such changes by posting the revised policy on this page. Be sure to check the Policy whenever you submit personal data or use our Site, communicate with us via email or engage with our social media accounts. The effective date of this Privacy Policy is June 1, 2020.

### Annex 1: NOTICE OF COLLECTION, USE AND DISCLOSURE

Sources of Information	Category and Types of Information we collect	How we use it	Third parties with whom we may share this information
<p>Your computer or mobile device, through your online activities and interactions with us, including, without limitation, your online activity on our Site, and on our social media channels or through our third-party sources.</p> <p>Third-party sources such as Google, publicly available data, other companies and referrals.</p>	<p>Internet/Network Activity - IP address, your device information, domain name, geolocation, browsers you used to access our Site, webpages viewed, time spent on webpages, links clicks, transactions entered into and site-navigation patterns</p>	<p>Better understand how you use our Site;</p> <p>Enhance, modify, or improve our Site, services, and general business;</p> <p>For other marketing, research, legal, and other business purposes;</p> <p>To comply with our policies, procedures, and legal obligations, including complying with law enforcement or governmental authority requests, investigating fraudulent activity, resolving disputes, and enforcing our legal agreements and policies.</p>	<p>Consultants, service providers, and contractors that we use to support our business and operations (e.g. hosting or operating our Site and services, data collection, reporting, Site metrics and analytics, data analysis, fraud detection services) who have agreed to keep the information confidential and use it only to provide the applicable services;</p> <p>Third parties (including, without limitation, governmental agencies) if required to do so by law, regulation or court order; to respond to governmental and/or law enforcement requests;</p> <p>An acquirer or successor-in-interest in the event of a reorganization, merger, sale, change of control, consolidation, joint venture, assignment, transfer or other disposition of all or any part of Citizen or its affiliates including any negotiation thereof.</p>