**California Consumer Privacy Rights Notice**

**Effective: February 4, 2020**

This California Consumer Privacy Rights Notice (“Notice”) sets forth Bold Buffer, LLC dba Safe Lighthouse’s (“Company”) disclosure obligations under California law, including the California Consumer Privacy Act of 2018 (“CCPA”) and the California Civil Code section 1798.83. This Notice provides the additional details regarding the information defined as ‘personal information’ under applicable California law and related to a California resident or household (“Consumers” and “You”) further referred to as “Personal Information.”

1. **Personal Information Collected and Disclosed:**

Company collects, uses and/or discloses Personal Information as follows:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Personal Information Collected, Used and/or Disclosed in Preceding 12 Months** | | | | | |
| **CCPA Category** | **Collected?** | **Source of Collection** | **Purpose** | **Disclosed for Business Purpose?** | **Purpose of Disclosure** |
| **Category A Identifiers & B Personal Information**   * Name/Alias | Yes | You | Account Creation;  Performing Services;  Audit  Data Security | Service Provider | Communications  Customer Support |
| * Email | Yes | You | Account Creation;  Performing Services;  Opt-In Communications;  Audit  Data Security | Service Provider | Communications  Customer Support |
| * Address | Yes | You | Payment Processing  Audit  Data Security | Service Provider | Payment Processor |
| * Cell or Telephone # | No | N/A | N/A | N/A | N/A |
| * Unique/Online ID (cookies) | Yes | You;  Device | Performing Services  Marketing | Service Provider | Marketing |
| * IP Address | Yes | You;  Device | Data Security  Analytics | Service Provider | Analytics |
| * Account Name | Yes | You | Account Creation  Performing Services | No | N/A |
| * Social Security # | N/A | N/A | N/A | N/A | N/A |
| * Driver’s License# | N/A | N/A | N/A | N/A | N/A |
| * Passport # | N/A | N/A | N/A | N/A | N/A |
| * Credit or Debit Card # /ACH | Yes | You | Payment Processing\*  (\* token only) | Service Provider | Payment Processing |
| * Other: Medical/Financial/Health | N/A | N/A | N/A | N/A | N/A |
| **Category C: Protected Characteristics** | N/A | N/A | N/A | N/A | N/A |
| **Category D: Commercial Information**   * Personal Property Records | N/A | N/A | N/A | N/A | N/A |
| * Products/Services Purchased-Obtained-Considered | N/A | N/A | N/A | N/A | N/A |
| * Purchasing history/tendencies | N/A | N/A | N/A | N/A | N/A |
| **Category E: Biometric Information** | N/A | N/A | N/A | N/A | N/A |
| **Category F: Internet/Network Activity**   * Browsing/search history * Interaction with site/advertisement | N/A | N/A | N/A | N/A | N/A |
| **Category G: Geolocation data** | Yes | You;  Device | Performing Services;  Generate requested demographic information | Service Provider | Generate requested demographic information |
| **Category H:**   * Audio | N/A | N/A | N/A | N/A | N/A |
| * Electronic | N/A | N/A | N/A | N/A | N/A |
| * Visual | N/A | N/A | N/A | N/A | N/A |
| * Thermal | N/A | N/A | N/A | N/A | N/A |
| * Olfactory | N/A | N/A | N/A | N/A | N/A |
| * Other Similar | N/A | N/A | N/A | N/A | N/A |
| **Category L: Professional/Employment-Related** | N/A | N/A | N/A | N/A | N/A |
| **Category J: Educational Information** | N/A | N/A | N/A | N/A | N/A |
| **Category K: Inferences from Data Collected**   * Preferences | N/A | N/A | N/A | N/A | N/A |
| * Characteristics | N/A | N/A | N/A | N/A | N/A |
| * Psychological Trends | N/A | N/A | N/A | N/A | N/A |
| * Predispositions | N/A | N/A | N/A | N/A | N/A |
| * Behavior | N/A | N/A | N/A | N/A | N/A |
| * Attitudes | N/A | N/A | N/A | N/A | N/A |
| * Intelligence/Abilities/Aptitudes | N/A | N/A | N/A | N/A | N/A |

**Other Potential Third Party Disclosures:** Personal Information may also be disclosed to third parties to serve our legitimate business interests as follows: (1) as required by law, such as to comply with a subpoena, or similar legal process, (2) as part of a merger, acquisition, bankruptcy or other transaction in which a third party assumes control of all or part of the business, (3) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies as required by law; (4) enforce our agreements with you, and/or (5) investigate and defend ourselves against any third-party claims or allegations.

1. **Sale of Personal Information**

Company does not sell and will not sell your Personal Information. CCPA Addendums have been entered into with applicable service providers certifying they understand the applicable CCPA restrictions relating to their processing of Personal Information.

1. **Your Consumer Rights under CCPA.**

California Consumers may contact Company through their account or by email at [privacy@safelighthouse.com](mailto:privacy@safelighthouse.com)

1. **Request Company Disclose At No Charge:**

* categories of Personal Information collected, used, and/or disclosed about you;
* categories of sources from which Personal Information is collected
* business and/or commercial purposes for collecting and disclosing your Personal Information;
* categories of third parties with whom your Personal Information has been disclosed/shared; and
* the specific pieces of Personal Information collected about you.

1. **Request Company to Delete At No Charge:**

Except as exempted pursuant to CCPA 1798.105, to request Company delete Personal Information.

1. **Consumer Request Limitations**

Please note that these rights are not absolute and in certain cases are subject to conditions or limitations as specified in the CCPA, including, but not limited to:

* Company is obligated to disclose/delete only upon a **verifiable** Consumer request from the consumer or an authorized agent acting on behalf of Consumer.
* Consumers may only make a personal information request twice in a 12-month period.
* Deletion is not required because it is necessary for Company to maintain the Personal Information to fulfill the purposes enumerated in CCPA Section 1798.105

Company will confirm and respond to all requests within the timeframe required under the CCPA. In responding to any request to disclose/delete, Company shall maintain a record of the requests as required under the CCPA.

1. **Non-Discrimination Policy**

You have the right not to receive discriminatory treatment for exercising any rights conferred by the CCPA. Company shall not discriminate against a consumer for exercising any rights under the CCPA, including, but not limited to, (a) denying goods or services, (b) charging different prices or rates (including discounts/penalties) that is not directly related to the value provided to Company for the Personal Information, (c) suggesting Consumer will receive a different rate/price or different level of quality of goods/services

1. **Your California Privacy Rights under California Civil Code Section 1798.83 & Business and Professions Code Section 22581**

California law permits Consumers to request and obtain from once a year, free of charge, certain information about their Personally Identifiable Information (“PII”) (as defined by California law) disclosed to third parties for direct marketing purposes in the preceding calendar year (if any). If applicable, this information would include a list of the categories of PII that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year.

In addition, a business subject to California Business and Professions Code Section 22581 must allow California residents under age 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted. Your request should include a detailed description of the specific content or information to be removed. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

1. **Accessibility of this CCPA Policy.**

* You can download and print a copy of this Notice.

1. **Contact Us**

Additional detail regarding our collection, use and disclosure of Personal Information, as well as general opt-out rights and other privacy disclosures, is set forth in our general Privacy Policy.

If you have any questions regarding your Personal Information or about our privacy practices, please contact us at: **Safe Lighthouse, Attention: Privacy Department, 22647 Ventura Blvd., Suite 238, Woodland Hills, CA. 91364 or at** [**privacy@safelighthouse.com**](mailto:privacy@safelighthouse.com)**.**

***This Notice was last updated: February 4, 2020***