



## Deputy Privacy Policy California Addendum

Last Updated January 2021

This addendum to the Deputy Privacy Policy applies to residents of the State of California, USA.

The terms set out in this California Addendum are in addition to the terms set out in the Privacy Policy and form an integral part of the Privacy Policy for California residents. In the event of any conflict or inconsistency between the Privacy Policy and the terms of this California Addendum, this California Addendum shall govern and prevail. Any terms not defined in the Privacy Policy but defined in the California Consumer Privacy Act of 2018 (CCPA) will have the same meaning when used in this California Addendum.

The purpose of this California Addendum is to provide you with a comprehensive description of our online and offline practices and your rights regarding our collection, use, disclosure, and sale of your Personal Information. This California Addendum provides details regarding the Personal Information that we have collected or disclosed within the preceding 12 months about California residents.

### 1. Personal Information that we collect

We have collected the following categories of Personal Information in the past 12 months:

Category	Examples	Collected
A. Identifiers	Real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers	See "Profile Information" in Privacy Policy
B. Personal information categories listed in the California Consumer Records statute (Cal. Civ. Code § 1798.80(e))	Name, signature, social security number, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information	See "Financial Information" in Privacy Policy
C. Protected classification characteristics under California or federal law	Age, race, colour, national origin, citizenship, marital status, gender, veteran or military status	See "Profile Information" in Privacy Policy
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	See "Usage and Activity Information" in Privacy Policy
E. Biometric information	Digital data representing your physical characteristics, including facial images,	See "Sensitive Information" in Privacy Policy



Category	Examples	Collected
	<p>fingerprints, eyeprints, retina or iris recognition, voiceprints, handprints, tattoos, and other similar data specific to you;</p> <p>Digital data representing your behavioral characteristics, such as handwriting, typing dynamics, gait analysis, speech recognition, familiar locations, often-used wifi networks, and other similar data specific to you.</p>	
F. Internet or other similar network activity	Browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement.	See "Usage and Activity Information"; "Device Information"; "Your Content" in Privacy Policy
G. Geolocation data	Physical location	Physical location of Authorized Users may be collected when authorized by Customer and/or User in Platform
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	Not collected
I. Professional or employment-related information	Current or past job history	See "Employment Information" in Privacy Policy
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Educational background (degree, level of education completed), student financial information	May be collected if provided by Customer or Authorized User in Deputy Platform
K. Inferences drawn from personal information	Your preferences and characteristics; information you know; items that you own or have in your possession; and other similar data specific to you	Deputy may combine personal information with information we collect through other means, and create new information from reviews, investigations, and analysis.

## 2. Sources of Personal Information collected by us

We obtain the categories of Personal Information listed above from a variety of sources, as described in our Privacy Policy, including from the following categories of sources:

- You provide it to us directly – e.g., by submitting a form, contacting us or entering it in using the Services;
- We receive it from another party or source – e.g., your employer organization, our related companies, public information and the parties described under '**Sharing and disclosure of personal information**' in the Privacy Policy;



- We collect it automatically – e.g., via cookies and log data relating to use of the Services.
- User devices, such as visits to our websites or mobile apps;
- Vendors who provide services on Deputy's behalf;
- Social networks;
- Online advertising companies;
- Publicly available sources; and
- Consumer data resellers.

### 3. Purposes for which we use Personal Information

As described further in our Privacy Policy and Services Privacy Notice, we may use the categories of Personal Information identified above for certain business purposes specified in the CCPA, including the following:

- **To provide and deliver the Services** to you and our customers (e.g. your employer) and to administer, assess, maintain and improve the performance of the Services.
- **To allow you to access** and use the Services (including authentication).
- **To personalize and optimize your experience** when using the Services and to ensure the Service is relevant to you, your device, and to deliver targeted content based on your information, location and preferences.
- **To provide you with assistance and support** in relation to your use of the Services and to processes and respond to a request or complaint that you may have.
- **To research and develop** the Services for the purposes of improving the Services, and to allow you to participate in surveys or interactive features of our Service when you choose to do so.
- **To communicate with you** about the Services and deliver promotional materials, special offers and general information about the Services which are similar to those you already use or enquired about unless you have opted not to receive such information.
- **To protect the safety and security of the Services** including detecting and responding to security incidents and other malicious or unlawful activity, and to detect, prevent and address technical issues.
- **To protect Deputy's legitimate business interests** including for fulfilling and exercising our obligations and rights including in circumstances where we are required to comply with regulatory orders and audit processes, and for exercising or defending legal claims.
- **To generate de-identified statistical data** to uncover collective insights about the use of our Service (and not to specifically analyze personal characteristics).
- **To verify your identity** and to detect fraud and potential fraud, including fraudulent payments and fraudulent use of the Service.
- **In connection with business transfers** to facilitate the sale, purchase, merger or demerger of any business by us, including assessing potential transfers and managing transitional arrangements.
- Other uses where you have provided your express consent.



#### **4. Sharing and disclosure of your Personal Information**

We do not sell your Personal Information. We have shared or disclosed the following Personal Information to third parties (such as our service providers, business affiliates and strategic business partners) for our operational business purposes:

- Your and our representatives.
- Technology and media partners (e.g. telecommunication service providers) that perform services for us or connect with the Services (e.g. third party applications, data storage services).
- Social media platforms (e.g. where you interact with our account or link your account to us or the Services).
- Our lawyers, accountants and professional advisors.
- Other third party service providers, such as third party branding service providers.
- Our related companies.
- Law enforcement authorities and government agencies where we are required or permitted to do so by law, or as a result of a legal process.
- Any third party that your employer directs us to share or disclose your personal information to.

Deputy operates in multiple countries and regions including Australia, New Zealand, USA, Canada, United Kingdom and EU. We may handle personal information, and transfer it to recipients, in these countries and other countries, including the Philippines.

We also may share your Personal Information in other ways for which we have provided specific notice to you, or for which you have specifically consented.

#### **5. California Individual Privacy Rights**

Under the CCPA, if you are a California resident, you may request that we:

- Disclose to you the following information covering the 12 months preceding your request:
  - The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
  - The specific pieces of Personal Information we collected about you;
  - The business or commercial purpose for collecting or selling (if applicable) Personal Information about you;
  - The categories of Personal Information about you that we sold and the categories of third parties to whom we sold such Personal Information (if applicable); and
  - The categories of Personal Information about you that we otherwise shared or disclosed, and the categories of third parties with whom we shared or to whom we disclosed such Personal Information (if applicable).
- Delete Personal Information we collected from you.

Under California's "Shine the Light" law, you have the right to ask us if we have shared your Personal Information with third parties for direct marketing purposes. Such requests may be made once per year.

To make a request for the disclosures or deletion described above under the CCPA or California's Shine the Light law, please contact us at:



Deputy Corporation  
388 Market St, Suite 1300  
San Francisco, CA 94111

1-888-532-4785

We will respond to your request consistent with applicable law. We will not discriminate against you for exercising your rights as described above.

When submitting a request, the 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 of such person); and
- 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 the authority of your authorized representative to make the request) and confirm that the Personal Information relates to you. As part of your request, please specify which right you are exercising and be prepared to provide your name and contact information. We may ask for additional information to verify your identity.

We will only use Personal Information provided in a request to verify the requestor's identity or authority to make the request.

We do not sell the Personal Information of individuals under the age of 16.

**No Children under 13**

This Site is not suitable for use by children under the age of 13. Deputy does not knowingly collect personal or other information from anyone under the age of 13.