

EFFECTIVE: October 28th, 2020

Security Statement

This Security Statement addresses region specific privacy as it applies to all the products, services, websites and apps offered by Eighty Twenty One Inc. and their affiliates (collectively “Polaris I/O”), except where otherwise noted. Polaris I/O refers to these products, services, websites and apps collectively as the “services” in this policy. Unless otherwise noted, our services are provided by Polaris I/O Inc. inside of the United States and everywhere else. This privacy statement is an extension to and forms part of the main Polaris I/O Privacy Policy.

1. California Supplemental Privacy Notice

SUMMARY OF PERSONAL INFORMATION THAT WE COLLECT ABOUT YOU

For individuals who are California residents, the California Consumer Privacy Act requires certain disclosures about the categories of personal information we collect and how we use it, the categories of sources from whom we collect personal information, and the third parties with whom we share it. We at Polaris I/O are big fans of keeping information simple for our users and we have worked hard at this in our Privacy Policy. While we have set out the categories below as required by the California Consumer Privacy Act, you can review our Privacy Policy for examples and other information that describes our data collection and use, as previously disclosed to you which have not changed under this notice.

Depending on how you interact with us, Polaris I/O may collect the following categories of information as summarized in the table below. If you are a California resident interacting with our site as a Respondent, all of your response data is owned by the person that sent you the survey (the Creator) and we recommend you contact them about their practices under the California Consumer Privacy Act. This Supplemental Notice also does not apply to personal information we collect from employees or job applicants in their capacity as employees or job applicants. It also does not apply to personal information we collect from employees, owners, directors, officers, or contractors of businesses in the course of our provision or receipt of business-related services.

All of the categories of personal information we collect about you (as detailed below) come from the following categories of sources:

- You, including through your use of our services
- Automatically collected from you
- Our affiliate companies
- Third parties

Categories of Personal Information We Collect	Categories of Third Parties with Which We Share that Information
Identifiers (such as name, email address)	<ul style="list-style-type: none"> - Third parties (such as our clients, service providers and integration partners) or your organization (through its licensing of a client account with us) - Our affiliate companies - Aggregators (such as analytics services)
Platform Activity (such as platform app usage)	<ul style="list-style-type: none"> - Third parties (such as our service providers and integration partners) - Our affiliate companies - Aggregators (such as analytics services)
Professional or Employment-Related Data (such as the name of your employer, your job title, your manager)	<ul style="list-style-type: none"> - Third parties (such as our service providers and integration partners) - Our affiliate companies - Aggregators (such as analytics services)
Other Information that Identifies or Can Be Reasonably Associated with You	<ul style="list-style-type: none"> - Third parties (such as our service providers and integration partners) - Our affiliate companies - Aggregators (such as analytics services)

Categories of Personal Information that we **DO NOT** Collect

- Personal Commercial Information (such as transaction data)
- Personal Financial Data (such as billing information)
- Internet Browsing History or Device Activity
- Location Information (e.g. inferred from your IP address)
- Legally Protected Classifications (such as gender and marital status)

CATEGORIES OF BUSINESS/COMMERCIAL PURPOSES FOR OUR USE OF YOUR INFORMATION

All of the categories of personal information we collect about you (as detailed above) are used for the following purposes:

- Providing our services (for example, account servicing and maintenance, customer service, health screening solicitation, analytics, and communication about our services)
- For our operational purposes, and the operational purposes of our service providers and integration partners

- Improving our existing services and developing new services (e.g., by conducting research to develop new products or features)
- Detecting, protecting against, and prosecuting security incidents and fraudulent or illegal activity
- Bug detection, error reporting, and activities to maintain the quality or safety of our services
- Auditing consumer interactions on our site (for example, measuring service usage)
- Short-term, transient use, such as customizing content that we or our service providers display on the services
- Other uses that advance our commercial or economic interests, such as third party advertising and communicating with you about relevant offers from third party partners
- Other uses that we notify you about

CALIFORNIA RIGHTS AND CHOICES

Subject to certain restrictions, California residents have the right to request that we disclose what personal information we collect about you, to delete any personal information that we collected from or maintain about you, and to opt-out of the redistribution of personal information about you. As a California resident, you also have the right to designate an agent to exercise these rights on your behalf. This section describes how to exercise those rights and our process for handling those requests, including our means of verifying your identity. If you would like further information regarding your legal rights under applicable law or would like to exercise any of them, please contact us

Accessing and Deleting Your Personal Information

- **Right to request access to your personal information** - California residents have the right to request that we disclose what categories of personal information that we collect, use, or redistribute about you. You may also request the specific pieces of personal information that we have collected about you. However, we may withhold some information where the risk to you, your personal information, or our business is too great to disclose the information.
- **Right to request deletion of your personal information** - You may also request that we delete any personal information that we have collected from/about you. However, we may retain personal information as authorized under applicable law, such as personal information required as necessary to provide our services, protect our business and systems from fraudulent activity, to debug and identify errors that impair existing functionality, as necessary for us, or others, to exercise their free speech or other rights, comply with law enforcement requests pursuant to lawful process, for scientific or historical research, for our own internal purposes reasonably related to your relationship with us, or to comply with legal obligations. We need certain types of information so that

we can provide our services. If you ask us to delete your information, you may no longer be able to access or use our services.

- **How to exercise your access and deletion rights** - California residents may exercise their California privacy rights by visiting <https://polarisio.com/contact-us/data-request/>.

For security purposes, we will request additional information from you to verify your identity when you request to exercise your California privacy rights.

If you have an online account with us, logging into your account will serve to verify your identity and request, although we may request additional information if we believe your account has been compromised. If you do not have an account with us, or if we have reason to suspect that the security of your account is compromised, we will request additional information from you to match with our existing records to verify your identity, depending on the nature of the request and the sensitivity of the information sought.

Once you submit a request to (1) access the categories of personal information we have about you or (2) obtain a copy of specific pieces of personal information we have about you, we will ask that you verify your identity by logging into your account using your username and password. There, we will provide you with your information.

To request that we delete personal information we have collected from you, you will need to authenticate with us by first logging into your account using your user name and password on file with us and deleting your account. Once you submit this action, we will initiate the deletion process.

If you wish to exercise any of these rights with us, please visit us at <https://polarisio.com/contact-us/data-request/> and we will guide you through the process.

Sales of Personal Information

California residents may opt out of the “sale” of their personal information. Polaris I/O does not “sell” your personal information as we understand that term to be defined by the California Consumer Privacy Act and its implementing regulations.

Non-Discrimination Rights

California residents have the right to not be discriminated against for exercising their rights as described in this section. We will not discriminate against you for exercising your CCPA rights.