**Effective Date:** [10/24/24]

**Last Reviewed on**: [10/24/24]

**Section 1. Purpose.**

# This Privacy Policy for California Residents ("Policy") is provided by Palmetto Technology Group, Inc. ("PTG" or "We"). Your privacy is important to us. To better protect your privacy, we provide this Policy to supplement PTG’s [Privacy Policy](https://www.goptg.com/privacy) ("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 Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (together, "CCPA"). This Policy explains how PTG collects, uses, retains, and discloses personal information about California residents. This Policy also explains certain rights that California residents have under the CCPA and how to exercise those rights. Any terms defined in the CCPA have the same meaning when used in this Policy.

# Section 2. CCPA Categories of Personal Information PTG Collects.

# As defined by the CCPA, we collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("Personal Information"). You have the right to know what kinds of personal information PTG collects, how we obtain and use that information, and our business purposes for that collection.

# In the preceding twelve (12) months, we have collected the following categories of Personal Information about California consumers. We may collect this personal information directly from you and from your interactions with our Website (for example, from forms you complete or products and services you purchase).

# CCPA Personal Information Categories

* Identifiers (e.g., real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, driver’s license numbers, account name, or other similar identifiers)
* Characteristics of Protected Classifications (e.g., gender, age, race, disability status, sexual orientation, gender identity, military and/or veteran status, marital status, national origin, and medical information)
* Commercial Information (e.g., information regarding products or services purchased, obtained, or considered)
* Biometric Information
* Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding consumer’s interaction with a website application or advertisement)
* Geolocation Data
* Audio, electronic, visual, thermal, olfactory, or similar information
* Professional or employment related information
* Education Information (e.g., information that is not publicly available educational information, as defined by FERPA)
* Inferences (e.g., inferences drawn from any of the information identified here to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes)
* Sensitive Personal Information (e.g., race or ethnicity)

We use and retain this personal information for the purposes outlined in our Privacy Policy. For additional details regarding the personal information PTG collects and where it is collected, please review our Privacy Policy.

PTG’s Websites and offerings are intended for adult audiences and are not directed to, or intended for, children, and PTG does not knowingly collect, sell, or share personal information from individuals under the age of sixteen (16).

# Section 3. CCPA Categories of Personal Information We Share.

In the preceding twelve (12) months, we may have engaged in “sharing” or a “sale” under the CCPA, which broadly defines this term as disclosing personal information for purposes of cross-context behavioral advertising, which is defined to include instances where companies target advertising based on personal information obtained from a consumer’s activity across distinctly-branded websites or services.

PTG does not collect, share, or sell any sensitive personal information, as described in the CCPA.

# Section 4. Purpose for Collection.

The CCPA requires us to describe the “business purposes” for which we may collect or disclose your personal information. We may disclose your personal information to fulfill and support the purpose for which you provided the information, such as inquiries regarding our services, or organizational purposes, security purposes, and legal and compliance purposes, as further described in our Privacy Policy. In the preceding 12 months, and where applicable, we have disclosed each of these categories to our service providers, subsidiaries and affiliates, contractors, and other third parties, in line with the applicable purpose(s) as described above in our Privacy Policy.

# 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.

# Section 5. Your Rights Under the CCPA.

The CCPA provides Californians with the following rights:

* Right to Know and Request Information. Under the CCPA, you have the right to know what personal information we collect, use, disclose, share and sell about you. You can also request that we that we disclose how we have collected, used, and disclosed your personal information over the past twelve (12) months, including the categories of personal information we collected, the categories of sources for that information, the categories of third parties with whom we shared it or disclosed such information, and the business purpose for that information.
* Right to Correct Personal Information. You have the right to request we correct personal information we collect and maintain about you, if such personal information is inaccurate. Upon verifying the validity of the verifiable consumer request, we will use commercially reasonable efforts to correct your personal information as directed, taking in to account the nature of the personal information and the purposes of maintaining the personal information.
* Right to Delete Personal Information. You have the right to request that we delete personal information we collected and maintain about you. We honor such requests unless an exception applies, such as when the information is necessary to complete the transaction or contract for which the personal information was collected, comply with state and federal laws, or comply with a legal obligation.
* Right to Opt Out of Sale or Sharing of Personal Information. You have the right to opt-out of the sale or sharing of your personal data. PTG may share your personal information with a third party for a business purpose, as described in our Privacy Policy, which may be considered a “sale” of personal data under the CCPA. You can opt out of the sharing of your personal information with third parties as described in our Privacy Policy.
* Right to Limit Use and Disclosure of Sensitive Personal Information. You have the right to limit the use or disclosure of your sensitive personal data to certain purposes specified by law. PTG does not sell sensitive personal data, so we do not offer an opt out. PTG may “share” personal information with third parties for personalized advertising purposes. You can opt out of the sharing of your personal information with third parties as described in our Privacy Policy.
* Right of No Retaliation. The CCPA prohibits businesses from discriminating against you for exercising your CCPA rights. Such discrimination may include denying services, charging different prices or rates for services, providing a different level or quality of services, or suggesting that you will receive a different level or quality of goods or services as a result of exercising your rights. We may, however, offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels.

# Section 6. Exercising Your Rights Under the CCPA.

We respond to verifiable requests received from individuals who wish to exercise their data protection rights in accordance with applicable data protection laws. If you would like to exercise your privacy rights under CCPA, or are an Authorized Agent making a request on behalf of a California consumer, please submit a request via email at privacy@GoPTG.com.

The information you provide will be used only to help verify and process your request. If you are an Authorized Agent, we reserve the right to request you demonstrate evidence of your authorization, either by providing us with a signed permission form or a copy of your power-of-attorney granting you such authority.

After submitting your request, please monitor your email for any follow-up communications from us. We will confirm receipt of your request within ten (10) business days. 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. 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.

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.

From the period of January 1, 2023, to January 1, 2024, PTG has received [XX] verifiable request from California consumers.

**Section 7. Contact Information.**

If you have any questions about this Policy, the data we hold on you, or if you would like to exercise one of your data protection rights, please do not hesitate to contact us. PTG can be reached at:

**Email**: privacy@GoPTG.com

**Address**: Palmetto Technology Group

330A Pelham Rd., Suite 200,

Greenville, SC 29615

**EXHIBIT A**

Acknowledgment of Consumer Request

[CONSUMER NAME]

[[POSTAL ADDRESS]/[EMAIL ADDRESS]]

[DATE]

RE: Response to Consumer Request Dated: [DATE]

Dear [[CONSUMER NAME]:

\*\*Acknowledgement of Request to Delete, Correct, or Know\*\*

Please allow this letter to serve as confirmation that we received your consumer request(s) to Delete, Correct, or Know your personal information collected by Client on [date]. We will process the request as soon as possible, and certainly within forty-five (45) days of the day we received the request. Before processing your request, we must verify your identity and that the personal information identified in your request relates to you.

\*\*Acknowledgement to Opt-Out of Sharing / Limit Use or Disclosure\*\*

Please allow this letter to serve as confirmation that we received your consumer request(s) to Opt-Out of Sharing of Personal Information/Limit Use or Disclosure of Sensitive Personal Information on [date]. We will process the request as soon as possible, and certainly within fifteen (15) days of the day we received the request.

If you have any further questions, please contact our Privacy Officer at privacy@GoPTG.com.

Sincerely,

[Name]

For and on behalf of PTG.

Request to Know Response Letter

[CONSUMER NAME]

[[POSTAL ADDRESS]/[EMAIL ADDRESS]]

[DATE]

RE: Response to Request to Know Dated: [DATE]

Dear [CONSUMER NAME]:

We write in response to the above-referenced Request to Know. California's consumer privacy laws grant California consumers the right to know what personal information a business collected, sold, or disclosed about them by submitting a verifiable consumer request, unless certain exceptions apply. For more information on the consumer's privacy rights in California, see PTG’s Privacy Notice available at: [URL].

Before processing your request, we must verify both your identity and that the personal information you asked us to disclose relates to you.

\*\*Unable to Verify Consumer Information\*\*

After reviewing the information you provided to date, we are unable to verify your identity. We, therefore, cannot honor your deletion request at this time. To help us verify your request, please provide [ADDITIONAL VERIFICATION INFORMATION REQUIRED].

\*\*Provide Consumer Information\*\*

We are pleased to enclose the information you requested. [INSERT INFORMATION].

If you have any further questions, please contact our Privacy Officer at privacy@GoPTG.com.

Sincerely,

[Name]

For and on behalf of PTG.

Request to Delete Response Letter

[CONSUMER NAME]

[[POSTAL ADDRESS]/[EMAIL ADDRESS]]

[DATE]

RE: Response to Request to Delete Dated: [DATE]

Dear [CONSUMER NAME]:

We write in response to the above-referenced Deletion Request. California's consumer privacy laws grant California consumers the right to request deletion of certain personal information we hold by submitting a verifiable consumer request, unless certain exceptions apply. For more information on the consumer's privacy rights in California, see PTG’s Privacy Notice available at: [URL].

Before processing your request, we must verify both your identity and that the personal information you asked us to delete relates to you.

\*\*No Records Found\*\*

After conducting a diligent search of our records, we have not found any related data to delete pursuant to your request. This is likely because we do not process personal information about you or we previously destroyed, erased, aggregated, or de-identified the personal information in accordance with our record retention obligations and practices. We have also forwarded your request to our service providers and contractors, and confirmed they similarly have not found any related data to delete/directed them to delete the personal information described in your request unless it falls within one of the permitted exceptions.

\*\*Records Found but retained because of an exception under CCPA\*\*

After careful review of your request, we determined that the California's privacy laws allow us, along with our service providers and contractors, to retain some of the personal information described in your request, as follows:

|  |  |
| --- | --- |
| **Retained Personal Information** | **Deletion Exception** |
| [PERSONAL INFORMATION DESCRIPTION] | Necessary to [CCPA OR CPRA DELETION EXCEPTION(S)] |
| [PERSONAL INFORMATION DESCRIPTION] | Necessary to [CCPA OR CPRA DELETION EXCEPTION(S)] |

You may not appeal or request a review of this decision.

\*\*Confirm to Delete Records\*\*

In response to the deletion request we have:

* Deleted, de-identified, or aggregated all of the remaining personal information described in your request.
* Directed our service providers and contractors to similarly delete the personal information described in your request unless an exception applies.

We will maintain a record of this request for at least twenty-four (24) months.

If you have any further questions, please contact our Privacy Officer at privacy@GoPTG.com.

Sincerely,

[Name]

For and on behalf of PTG.

Request to Correct Response Letter

[CONSUMER NAME]

[[POSTAL ADDRESS]/[EMAIL ADDRESS]]

[DATE]

RE: Response to Request to Correct Dated: [DATE]

Dear [CONSUMER NAME]:

We write in response to the above-referenced Request to Correct. California's consumer privacy laws grant California consumers the right to request correct inaccurate personal information the business may hold about the consumer by submitting a verifiable consumer request, unless certain exceptions apply. For more information on the consumer's privacy rights in California, see PTG’s Privacy Notice available at: [URL]. Before processing your request, we must verify both your identity and that the personal information you asked us to correct relates to you.

\*\*Unable to Verify Consumer Information\*\*

After reviewing the information you provided to date, we are unable to verify your identity. We therefore cannot honor your deletion request at this time. To help us verify your request, please [ADDITIONAL VERIFICATION INFORMATION REQUIRED].

\*\*Inaccurate Personal Information Corrected\*\*

We were able to determine the accuracy of the contested personal information based on the totality of the circumstances. We are pleased to notify you that we have corrected the inaccurate personal information on our existing systems and have instructed our service providers and contractors to make the necessary corrections in their systems.

\*\*Personal Information Not Corrected\*\*

We were unable to determine the accuracy of the contested personal information based on the totality of the circumstances. We considered (i) the nature of the personal information, (ii) how Client obtained the contested information, and (iii) documentation provided to us related to the accuracy of the personal information and we determined that the personal information is more likely than not accurate. Upon full or partial denial of a consumer request to correct inaccurate personal information, the consumer is entitled to request that we delete the personal information instead. Please submit a request to delete by emailing us at [EMAIL ADDRESS].

If you have any further questions, please contact our Privacy Officer at privacy@GoPTG.com.

Sincerely,

[Name]

For and on behalf of PTG.