



37 Market Street
Kenilworth, NJ 07033

onediversified.com

California Privacy Policy

Effective Date: January 1, 2021

Last Revised on: June 10th, 2024

This **Privacy Policy for California Residents** (“CCPA Policy”) supplements and appends the information contained in Diversified’s and its affiliates’ (collectively, “Company”) general Privacy Policy (available at <https://www.Diversifiedus.com/privacy-policy/>), and applies solely to all visitors, users, and other consumers who reside in the State of California (“consumers” or “you”). The Company has adopted this CCPA Policy to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and related regulations. Any terms defined in the CCPA have the same meaning when used in this CCPA Policy whether or not such terms are capitalized herein, unless contrary to the meaning thereof.

Personal Information: As used in this Notice, “Personal Information” means 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 includes Sensitive Personal Information but does not include protected health information covered by the Health Information Portability and Accountability Act (“HIPAA”), nonpublic personal information under the Gramm-Leach-Bliley Act (“GLBA”), or any other information which is exempt from the CCPA.

For specific exclusions to the CCPA, please see the link below.

https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?division=3.&part=4.&lawCode=CIV&title=1.81.5

Sensitive Personal Information: As used in this Notice, “Sensitive Personal Information” includes Personal Information that reveals, among other things, social security number, driver’s license number, state identification card number, passport number, racial or ethnic origin, union membership, or the contents of a Consumer’s mail, email, and text messages, unless Diversified is the intended recipient of the communication.

1. Information We Collect

We collect information that identifies Personal Information. In particular, we have collected the following categories of Personal Information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A 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.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, 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. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES



F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
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)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

We obtain the categories of Personal Information listed above from the following categories of sources:

- Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services to them.
- Directly and indirectly from activity on our website. For example, from submissions through our website portal or website usage details collected automatically.
- From our service providers that perform services on our behalf.
- Third-party data providers.
- Directly from you. For example, when you create an account, register your services, make a purchase, apply for or accept an employment position with us.

2. Use of Personal Information

We may use or disclose the Personal Information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with Personal Information in order for us to quote



a price or in connection with asking a question about our products or services, we will use that Personal Information to respond to your inquiry.

- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news that may be of interest to you.
- To carry out our obligations in fulfilling your order.
- To enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court or administrative order, or governmental regulations.
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of Personal Information or use the Personal Information we collect for materially different, unrelated, or incompatible purposes without providing you notice.

3. Sharing Personal Information

We may disclose your Personal Information to a third party for business purposes. When we disclose Personal Information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for a business purpose:

Category A: Identifiers.

Category B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).

Category C. Protected classification characteristics under California or federal law.

Category D. Commercial information.

Category E. Biometric information.

Category F: Internet or other similar network activity.

Category G. Geolocation data.

Category I. Professional or employment-related information.



Category 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)).

Category K. Inferences drawn from other personal information.

We disclose your Personal Information for a business purpose to the following categories of third parties:

- Partners.
- Parent or subsidiary organizations.
- Internet cookie data recipients, like Google Analytics.
- Data analytic providers.
- Government entities.
- Operating systems and platforms.
- E-signature platforms like DocuSign.
- Cloud providers.
- Fraud prevention providers.
- Customer relationship management (CRM) providers.
- Legal advisors, auditors, and collection agencies.
- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold any Personal Information.

4. Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

a. Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting or (if applicable) selling that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you.



- If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
 - sales, identifying the Personal Information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

If you request a copy of your Personal Information, we will provide it in a portable and, to the extent technically feasible, in a readily useable format that allows you to transmit this information to another entity without hindrance.

Requests to access your Personal Information may be submitted up to two times in a rolling twelve-month period, to the extent required by law.

b. Deletion Request Rights

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions (such as if the business is legally required to keep the information). Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

c. Opt-Out Rights

Under the CCPA, California residents can choose to opt out of the “sale” of their Personal Information to third parties. By contacting us through one of the mechanisms listed in Section 5 below, we will no longer collect or sell your Personal Information. This applies both to third parties and the data we collect to help personalize your experience on our website or through other communications.

To be eligible to opt-out, you must be browsing from California.

d. Right to Correct

You have the right to request that we correct any inaccurate information that we have on you.

e. Right to Limit the Use and Disclosure of Sensitive Personal Information

You have the right to limit the use and disclosure of Sensitive Personal Information collected about you to certain purposes permitted by law.



5. Exercising Your California Privacy Rights

To exercise your California Privacy Rights described above, please submit a verifiable consumer request to us by either:

- Calling us at: 844-767-2738
- Online: <https://diversifiedus.com/Opt-Out>
- Online: <https://diversifiedus.com/exercisemyprivacyrights.com>
- Emailing: privacy@onediversified.com
- Mailing: Attention: Legal Department (Privacy), 37 Market Street, Kenilworth NJ 07033

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

The verifiable consumer request must (to the extent required by law):

- Provide sufficient information that allows us to reasonably verify you are the person or an authorized representative of the person we collected Personal Information on.
- 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 authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

6. Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. For an opt-out request, we will respond within 15 business days from the date we receive your request to opt-out. 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, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, as noted above we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.



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.

7. Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not, because you exercised such rights:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

8. Minors Under Age 16

We do not and will not “sell” the Personal Information of consumers we know to be less than 16 years of age, unless we receive affirmative authorization (the "Right to Opt In") from either the minor who is between 13 and 16 years of age, or the parent or guardian of a minor less than 13 years of age.

9. California’s “Shine the Light” Law

In addition to the rights described above, California's "Shine the Light" law (Civil Code Section §1798.83) permits California residents that have an established business relationship with us to request certain information regarding our disclosure of certain types of Personal Information to third parties for their direct marketing purposes during the immediately preceding calendar year. To make such a request, please send an email to privacy@onediversified.com. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the email address specified in this section.

10. Changes to Our Privacy Notice

We reserve the right to amend this CCPA Policy at our discretion and at any time. When we make changes to this CCPA Policy, we will change the “Last Updated” date. All changes shall be effective from the date of publication unless otherwise provided.

11. Contact Information

If you have any questions or comments about this CCPA Policy, please do not hesitate to contact us at:

Phone: 844-767-2738

Email: privacy@onediversified.com

Mailing Address: Attention: Legal Department (Privacy), 37 Market Street, Kenilworth NJ 07033

