Intrepid Networks, L.L.C is complying with the CCPA (as it pertains to us) and considering its underlying principles in how we think about customer trust and data privacy as a core pillar of our business. We are providing this CCPA-specific privacy notice to supplement the information and disclosures already contained in our Privacy Policy. This notice applies to individuals residing in California from whom we collect Personal Information.

In general, we do not sell your Personal Information.

The chart below outlines the categories of Personal Information (as defined by the CCPA) that we have collected and/or disclosed for a business purpose in the preceding twelve months. The examples of Personal Information provided for each category are taken from the CCPA and are included to help you understand what the categories mean. The examples are not meant to indicate what we actually collect or disclose, and more information about our specific practices can be found in our Privacy Policy.

| Category | We Collect | We Disclose | We Sell |
| --- | --- | --- | --- |
| **A. Identifiers** | Yes  | Yes  | No  |
| Examples: 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. |  |  |  |
| **B. Categories of Personal Information in Cal. Civ. Code 1798.80(e)** | Yes  | Yes  | No  |
| Examples: 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. |  |  |  |
| **C. Characteristics of Protected Classifications under California or Federal Law** | Yes  | Yes  | No |
| Examples: Race or color, ancestry or national origin, religion or creed, age (over 40), mental or physical disability, sex (including gender and pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, gender identity or expression, medical condition, genetic information, marital status, military and veteran status. |  |  |  |
| **D. Commercial Information** | Yes | Yes  | No |
| Examples: Records of personal property, products or services purchased, obtained, reviewed, or considered, or other purchasing or consuming histories or tendencies. |  |  |  |
| **E. Biometric Information** | Yes  | Yes  | No  |
| Examples: Physiological, biological, or behavioral characteristics, including DNA, that can be used, singly or in combination with each other or with other identifying data, to establish individual identity, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information. |  |  |  |
| **F. Internet or Other Electronic Network Activity Information** | Yes  | Yes  | No  |
| Examples: Browsing history, search history, and information regarding a consumer’s interaction with an internet website, application or advertisement. |  |  |  |
| **G. Geolocation Data** | Yes  | Yes  | No  |
| Example: Precise physical location. |  |  |  |
| **H. Sensory Information** | Yes  | Yes  | No  |
| Examples: Audio, electronic, visual, thermal, olfactory, or similar information. |  |  |  |
| **I. Professional or employment-related information** | Yes | Yes  | No  |
| Examples: Job application or resume information, past and current job history, and job performance information. |  |  |  |
| **J. Non-Public Education Information (as defined in 20 U.S.C. 1232g; 34 C.F.R. Part 99)** | No  | N/A  | N/A  |
| Examples: Records that are directly related to a student maintained by an educational agency or institution or by a party acting for the agency or institution. |  |  |  |
| **K. Inferences Drawn from Personal Information** | Yes  | Yes | No  |
| Examples: Consumer profiles reflecting a consumer’s preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. |  |  |  |

**Use of Personal Information**

The CCPA defines various business and commercial purposes for collecting, using, and disclosing Personal Information. While we collect, use, and disclose Personal Information pursuant to our [Privacy Policy](https://www.leadspedia.com/privacy-policy.html) as a whole, we wanted to clarify that this includes Personal Information in accordance with the specific CCPA business and commercial purposes as follows:

1. Auditing related to a current interaction with you and concurrent transactions, including, but not limited to auditing compliance with this specification and other standards.
2. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
3. Debugging to identify and repair errors that impair existing intended functionality.
4. Short-term, transient use.
5. Contracting with service providers to perform services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
6. Undertaking internal research for technological development and demonstration.
7. Undertaking activities to verify or maintain the quality or safety of our services, and to improve, upgrade, or enhance our services.
8. Otherwise enabling or effecting, directly or indirectly, a commercial transaction.
9. For other purposes for which we provide specific notice at the time the information is collected.

**Collection and Disclosure of Personal Information**

In the preceding twelve months since this notice was last updated, we have collected Personal Information from general sources including you, your use of our services, your devices, our affiliates, our vendors, and our service providers. More specific information about Personal Information we collect is laid out in this notice and in our [Privacy Policy](https://www.leadspedia.com/privacy-policy.html), which we update from time to time.

As also explained in our Privacy Policy, we share your Personal Information with the following categories of CCPA third parties:

1. Affiliates.
2. Vendors and service providers, including for data analytics and marketing and advertising our products and services to you.
3. Third parties integrated into our services.
4. Third parties as required by law and similar disclosures.
5. Third parties in connection with a merger, sale, or asset transfer.
6. Other third parties for whom we have obtained your permission to disclose your Personal Information.

**Your California Privacy Rights**

If you are a California resident, you may exercise the following rights.

**Right to Know and Access.** You may submit a verifiable request for information regarding the: (1) categories of Personal Information collected or disclosed by us; (2) purposes for which categories of Personal Information are collected by us; (3) categories of sources from which we collect Personal Information; and (4) specific pieces of Personal Information we have collected about you during the past twelve months.

**Right to Delete**. Subject to certain exceptions, you have the option to delete Personal Information about you that we have collected from you.

**Verification.** Requests for access to or deletion of Personal Information are subject to our ability to reasonably verify your identity in light of the information requested and pursuant to relevant CCPA requirements, limitations, and regulations.

**Right to Equal Service and Price.** You have the right not to receive discriminatory treatment for the exercise of your CCPA privacy rights, subject to certain limitations.

**Shine the Light.** We do not rent, sell, or share your Personal Information with nonaffiliated companies for their direct marketing purposes, unless we have your permission.

Contact Information

If you have any questions, or would like more information on our privacy practices, please contact us at privacy@intrepid-networks.com or by mail at:

Intrepid Networks, L.L.C

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