



Privacy Notice and Notice at Collection For California Residents

Revision Effective Date: June 27, 2020

This **Privacy Notice and Notice at Collection for California Residents** supplements the information contained in Myers and Stauffer's ("MSLC" or "we") Privacy Policy and applies solely to consumers who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice.

This Notice does not apply to employment-related personal information collected from California-based employees, job applicants, contractors, or similar individuals (to whom we provide separate notices). Also, due to a temporary CCPA exemption and because we do not sell personal information, this Notice does not apply to personal information reflecting a written or verbal business-to-business communication ("**B2B personal information**").

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, we may collect, and within the last twelve (12) months we may have collected, the following categories of personal information from consumers through our Website and social media pages:

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,	YES

	driver's license number, passport number, or other similar identifiers.	
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>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.</p> <p>Some personal information included in this category may overlap with other categories.</p>	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).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
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.	NO
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.	NO

<p>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)).</p>	<p>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.</p>	<p>NO</p>
<p>K. Inferences drawn from other personal information.</p>	<p>Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<p>NO</p>

Through our Website and social media pages, we may obtain, and during the last twelve (12) months may have obtained, the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or information you submit through any Website portal or comment function. We may also collect information from you, depending on your social media privacy settings, if you choose to interact with our pages on social media sites (e.g. LinkedIn and Twitter).
- Indirectly from you. We automatically collect several types of information from and about users of our Website using automatic data collection technologies, including information about your web browser, your internet connection, your Internet Protocol address, the equipment you use to access our Website, your operating system, your time zone and some of the cookies that are installed on your device. We also collect information about the details of your visits to our Website, including individual web pages and resources you view or use, what websites or search terms referred you to our Website, your search queries on the Website and information about how you interact with and use the Website. The technologies we use for automatic data collection may include:
 - Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer or device. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system (and potentially also third-party systems of content, software or application providers) will issue cookies when you direct your browser to our Website.
 - Log Files. These are small files which track actions occurring on our Website and collect data, including your Internet Protocol address, browser type, internet service provider, referring/exist pages and date/time stamps.



- Web Beacons. Pages of our Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit MSLC, for example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- From third parties. Some content or applications on the Website are served by third parties, including content providers and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about any targeted content, you should contact the responsible provider directly. MSLC uses Google Analytics to help us understand how visitors use our Website. You can read more about how Google Analytics collects and processes data at: www.google.com/policies/privacy/partners/.

Use and Disclosure of Personal Information

We may use or disclose, and during the last twelve (12) months may have used or disclosed, the personal information we collect (as outlined above) for one or more of the following business and/or commercial purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask about our products or services, we will use that personal information to respond to your inquiry.
- To interact with you on our social media pages, where appropriate, and to improve and optimize our social media pages.
- To present our Website and its contents to you and to improve and optimize the Website (for example, by generating analytics about how our visitors browse and interact with the Website).
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- To enforce or apply our Website Terms of Use.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations
- To meet professional standards (e.g. American Institute of Certified Public Accountants standards)



- 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 about our Website users or consumers who have interacted with our social media pages is among the assets transferred

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.

Sharing Personal Information

We may share, and during the last twelve (12) months may have shared, your personal information (as outlined above) with the following categories of third parties for the business purposes indicated above:

- Service providers
- Organizational affiliates
- Third parties that you intentionally use us to interact with or disclose information to (e.g. social media companies, when you interact with our social media pages) or third parties to whom you or your agents direct us to disclose your personal information.
- To legal authorities, third parties as required by valid legal process, legal counsel, consultants and experts
- To information technology (IT) or cybersecurity vendors
- Other organizations as necessary or appropriate to meet professional standards or protect the rights, property, or safety of MSLC, our customers, or others
- To a buyer of or other successor to our company

Sale of Personal Information

In the preceding twelve (12) months, we did not sell personal information. MSLC does not sell personal information triggering opt out requirements under the CCPA.

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.

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 (see Exercising Access, Data Portability, and Deletion Rights), 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 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 (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list of disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

We do not provide these access and data portability rights for B2B personal information.

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. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.



We do not provide these deletion rights for B2B personal information.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Visiting <https://myersandstauffer.com/contact-us/>
- Emailing us at info@mslc.com
- Calling us at 800-374-6858

Only you, or someone legally authorized 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 or another person if you are authorized to act on their behalf. To designate an authorized agent (except when you have provided an appropriate power of attorney), please (i) contact us to verify your identity; (ii) confirm with us that you have given the agent authorization to submit a request on your behalf; and (iii) provide the authorized agent with written and signed permission to act on your behalf (please provide us with a copy).

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer 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.
- 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.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 45 additional days), we will inform you of the reason and extension period in writing.

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, 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.

Non-Discrimination

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

- 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.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which MSLC collects and uses your information described here and in our Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Website: <https://myersandstauffer.com/contact-us/>

Email: info@mslc.com

Phone: 800-374-6858