

This chart supplements Effectual’s Privacy Policy, and is effective April 1, 2020.

A middle column lists examples (as “**representative data elements**”) provided by the California Consumer Privacy Act (“**CCPA**”), to help explain what each category means. That an example is listed does not mean we necessarily collect it through use of our Website. Please read below where we identify which we do collect through use of our Website. Where we say we do not collect certain types of personal Information (“**PI**”), please do not include it in your communications with us. PI nonetheless received, or received from unexpected or otherwise unlisted sources, will be handled by us in accordance with the Policy.

“**Personal information**” includes the following, but only **if/when** it is maintained in a manner that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular individual or household:

Categories of PI We May Collect	Sources We May Collect PI from Through Use of Our Website	Representative Data Elements May Include	Purpose(s) of Collection – How We May Use the PI	Categories of Recipients We May Share PI With
A. Identifiers.	You.  Your browsers, and/or devices’, interaction with our Website or e-mails from us, or links to our Website, including from “cookies” (and similar technologies).	<p><b>Contact information:</b> Real name; alias; postal address; telephone number; email address.</p> <p><b>We may collect</b> names, e-mail addresses, company names, partial physical addresses (city, and state or province, not street address), and telephone numbers from those who reach out to us through our Website’s contact form.</p> <p><b>We collect</b> e-mail addresses from those who request to receive e-mail communications from us.</p> <p><b>We do not collect</b> social security numbers; driver’s license numbers; passport numbers; similar personal identifiers including state identification numbers.</p>	<p><b>Contact information</b> may be used for our Business and Commercial Purposes (described in more detail at the end of this chart). These may include to communicate with you, including providing e-mail newsletters you have requested, to otherwise administer our relationship with you, and to market our services, including to identify our resources best suited for your geographic area and industry.</p> <p><b>IP address</b>, for our Business and Commercial Purposes, including to make sure our Website works properly with your device; to recognize your device and your preferences when you return to our Website;</p>	<p>Companies with which we have contractual relationships (“service providers”), to administer our relationship with you (such as for e-mails, customer support), and otherwise operate our business, including to help us maintain the security and functionality of our Website and other assets (including IT vendors); to assist us in analyzing use of our Website and other services (such as analytics providers); to help us market our services.</p> <p>Other entities, such as social media sites, to assist you in sharing content, or</p>



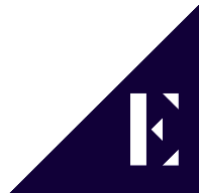
Categories of PI We May Collect	Sources We May Collect PI from Through Use of Our Website	Representative Data Elements May Include	Purpose(s) of Collection – How We May Use the PI	Categories of Recipients We May Share PI With
		<p><b>We collect Internet Protocol (“IP”) addresses.</b> IP addresses are only PI <b>if/when</b> maintained in a manner that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular individual or household. IP addresses merely collected from visits to our Website, where not linked or reasonably linkable to particular individuals or households, are not PI.</p>	<p>to protect the integrity of our Website such as by identifying and preventing fraud and unauthorized users; where maintained in a manner by which we may be able to reasonably identify you (such as if you have requested e-mails from us or otherwise contact us through the Website), to market our services; to assist you in sharing content from our Website or accessing links from our Website; for our analytical purposes.</p>	<p>linking to them from our Website.</p>
<p>B. Cal. Civil Code Sec. 17980.80(e) categories. (Those that are redundant of another CCPA category are addressed in the more specific sections of this chart).</p>	<p>None.</p>	<p><b>We do not collect</b> your signature; physical characteristics or description; insurance policy number; bank account number; credit card number; debit card number; or any other financial information, medical information, or health insurance information.</p>	<p>N/A</p>	<p>N/A</p>
<p>C. Certain statutory classifications.</p>	<p>You.</p>	<p>Such as age, gender, race, religion, disability.</p> <p><b>We may collect</b> information that may disclose gender, disability, age.</p>	<p>For our Business Purposes, if relevant to administering our relationship with you or your household (such as using your preferred gender identifier in communications; addressing disability accommodations you may request; complying with</p>	<p>Our service providers.</p>



Categories of PI We May Collect	Sources We May Collect PI from Through Use of Our Website	Representative Data Elements May Include	Purpose(s) of Collection – How We May Use the PI	Categories of Recipients We May Share PI With
			legal obligations related to children).	
D. Commercial information.	You.	Such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming habits or tendencies.  <b>We collect</b> , as to searches on our Website, and transactions with us.	For Business Purposes, where relevant to administering our relationship with and to provide our services to you; for Commercial Purposes, to market our services.	Our service providers.
E. Biometric information (physiological, biological, or behavioral characteristics that can be used to establish individual identity, either alone or in combination with other data).	None.	<b>We do not collect</b> biometric information, such as fingerprints, retina images, voice recordings, from which an identifier template can be extracted; keystroke patterns or rhythms, gait patterns or rhythms; sleep, health, or exercise data that contain identifying information.	N/A	N/A
F. Internet or other electronic network information.	Your browsers, and/or devices' interaction with our Website or e-mails from us, or links to our Website, including from cookies and similar technologies).	<b>We collect</b> , such as browsing history, search history, information regarding your interaction with an internet website, application, or advertisement.  <b>We collect</b> device information such as operating system and browser used, type of device (such as laptop, tablet, smartphone), internet service	For our Business and Commercial Purposes, including to present our online services to you and make sure our Website works properly with your device; to assist you in sharing content from our Website or accessing links from our Website; to protect the integrity of our Website such as by identifying and preventing fraud and unauthorized users;	Our service providers.



Categories of PI We May Collect	Sources We May Collect PI from Through Use of Our Website	Representative Data Elements May Include	Purpose(s) of Collection – How We May Use the PI	Categories of Recipients We May Share PI With
		provider, device cookie settings, IP addresses.	to monitor and improve our Website; to market our services; and for our analytical purposes.	
G. Geolocation data.	Your browsers' and/or devices' IP addresses.	<b>We collect</b> some information about physical location from your device's IP address (for example, country, region, area code).	For our Business and Commercial Purposes, including to protect the integrity of our Website such as by identifying and preventing fraud and unauthorized users; to monitor and improve our Website; to market our services, including to identify our resources best suited for your geographic area; and for our analytical purposes.	Our service providers.
H. Audio, electronic, visual, or similar information.	None.	<b>We do not collect.</b>	N/A	N/A
I. Professional or employment-related information.	You.	<b>We request, and may collect</b> the name of the company you work for when you reach out to us through our Website contact form. <b>We may collect</b> job titles of those who are or may be interested in our services.	For our Business and Commercial Purposes, including to market our services, including to identify our resources best suited for your industry, and for our analytical purposes.	Our service providers.
J. Certain Education information (non-publicly)	None.	<b>We do not collect.</b>	N/A	N/A



Categories of PI We May Collect	Sources We May Collect PI from Through Use of Our Website	Representative Data Elements May Include	Purpose(s) of Collection – How We May Use the PI	Categories of Recipients We May Share PI With
available, protected by federal law (FERPA)).				
K. Inferences.	You. Your browsers, and/or devices' interaction with our Website or e-mails from us, or links to our Website, including from cookies and similar technologies).	<b>We collect</b> references, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, aptitudes.	For our Business and Commercial Purposes, including to personalize your Website experience; to market our services; for our analytical purposes.	Our service providers.

We provide here for convenience CCPA definitions of “business” and “commercial” purposes:

**“Business purpose”** means use of personal information to achieve our, or our service providers’, operational purposes, or other notified purposes, provided the use is reasonably necessary and proportionate to achieve the operational purpose for which the PI was collected or processed, or for another operational purpose that is compatible with the context in which the PI was collected: (1) Auditing related to a current interaction with you and concurrent transactions, and auditing compliance with this and other standards; (2) detecting security incidents; protecting against malicious, deceptive, fraudulent, or illegal activity; and prosecuting those responsible; (3) debugging to identify and repair errors that impair intended functionality; (4) short-term, transient use (where not disclosed to a third party and used to build a consumer profile or otherwise alter your experience outside the current interaction); (5) performing services on behalf of us or our service provider, including maintaining or servicing accounts; providing customer service; processing or fulfilling orders and transactions; verifying customer information; processing payments; providing financing; providing advertising or marketing for our services; providing us analytics about our services; or providing similar services on our or our service providers’ behalf; (6) internal research for technological development and demonstration; (7) activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance that service or device; and (8) information related to job applicants, employees, directors, officers, and contractors, collected and used in the those contexts, including emergency contacts and benefit administration.

**“Commercial purpose”** means to advance one’s commercial or economic interests, such as by inducing someone to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction.

