

This section contains disclosures required by the California Consumer Privacy Act (“CCPA”) and applies only to “personal information” that is subject to the CCPA. For example, this notice does not apply to personal information that is exempted from the CCPA, such as personal information covered by other privacy laws like the Health Insurance Portability and Accountability Act, the Confidentiality of Medical Information Act, the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, or the California Financial Information Privacy Act. Consumers with disabilities may access this notice by using a standard screen reader or contacting us at (408) 739-8300.

Personal Information We Collect and Disclose for a Business Purpose. We collect the categories of personal information about California consumers identified in the chart below. As further set forth in the chart below, in the past twelve (12) months, we have disclosed California consumers’ personal information to third parties for business or commercial purposes.

Categories of Personal Information	Collected in the last twelve (12) months:
Personal and online identifiers (such as first and last name, email address, or unique online) identifiers	Yes
Categories of information described in Section 1798.80(e) of the California Civil Code (such as 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)	Yes
Characteristics of protected classifications under California or federal law (such as race or gender)	Yes
Commercial or transactions information (such as records of personal property or products or services purchased, obtained or considered)	Yes
Internet or other electronic network activity information (such as browsing history, search history, interactions with a website, email, application, or advertisement)	Yes
Biometric information (such as call recordings)	Yes
Geolocation information	No
Sensory information (such as audio, electronic, visual, thermal, olfactory, or similar information)	No

Professional or employment-related information	Yes
Non-Public Education information	No
Inferences drawn from the above information about your predicted characteristics and preferences	No
Other information about you that is linked to the personal information above	Yes

Categories of Sources. We collect the categories of personal information listed above from the following categories of sources:

- Directly from our clients / consumers or their agents. For example, from documents that our clients provide to us related to the products and services for which they engage us;
- Indirectly from our clients / consumers 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 third-parties that interact with us in connection with the services we perform; and
- From our affiliates.

Why We Collect, Use, and Share California Information. We use and disclose the personal information we collect for our commercial and business purposes, as further described in this Privacy Policy. These commercial and business purposes include, without limitation:

- Our commercial purposes, including providing services and products to you, marketing, advertising, and enabling commercial transactions.
- Our business purposes as identified in the CCPA, which include:
 - Performing services (for us or our service providers) such as account servicing, processing payments, and analytics;
 - Auditing related to our interactions with you;
 - Legal compliance;
 - Detecting and protecting against security incidents, fraud, and illegal activity;
 - Debugging;

- Internal research for technological improvement;
- Internal operations;
- Activities to maintain and improve our services; and
- Other one-time uses.

We disclose the categories of personal information designated above to the categories of third parties listed below for business purposes:

- Service providers;
- Affiliates;
- Data analytics providers; and
- 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.

Your Rights Regarding Personal Information. California residents have certain rights with respect to the personal information collected by businesses. If you are a California resident, you may exercise the following rights regarding your personal information, subject to certain exceptions and limitations:

- The **right to know** the categories and specific pieces of personal information we collect, use, disclose, and sell about you, the categories of sources from which we collected your personal information, our purposes for collecting or selling your personal information, the categories of your personal information that we have either sold or disclosed for a business purpose, and the categories of third parties with which we have shared personal information, in each case, in the preceding twelve (12) months;
- The **right to request that we delete** the personal information we have collected from you or maintain about you, subject to certain exceptions. 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.
- The **right not to receive discriminatory treatment** for the exercise of the privacy rights conferred by the CCPA. We will not discriminate against you, in terms of price or service that we offer, if you submit one of the requests listed above.
- The right to **opt-out** of “sale” and certain sharing practices.

To exercise any of the above rights, please contact us using the following information and submit the required verifying information, as further described below:

- By phone at (408) 739-8300.
- Email at info@asibrokers.com

Verification Process and Required Information. 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 designate an authorized agent to make a CCPA request on your behalf by sending proof of an authorized agent to us at info@asibrokers.com. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a twelve (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. Note that we may need to request additional information from you to verify your identity or understand the scope of your request. 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 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. If you have an account with us, we will deliver our written response to the contact email address associated with 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 twelve (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, specifically by electronic mail communication.

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.

Minors' Right to Opt In. We do not collect or sell the personal information of minors under 16 years of age.

Changes to Our Privacy Policy. We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will

notify you by email or through a notice on our website homepage. We encourage you to periodically review this Site for any updates or changes.

Contact for More Information. For questions or concerns about ASIB's privacy policy or practices, please contact us by using the information below.

- By phone at (408) 739-8300.
- Email at info@asibrokers.com