

Privacy Notice for California Residents

Effective Date: January 1, 2020

Last Reviewed: March 18, 2020

This Privacy Notice for California Residents supplements the information contained in our general [Privacy Policy](#). It applies solely to all visitors, users, and others 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.

If you are using the Kandji service through a corporate account, please contact the company in question with any request to exercise your CCPA rights. Do not submit requests directly to us as such communication should go through the company that maintains the account.

1. Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, this site and its mobile version collect the following categories of personal information from California consumers within the last twelve (12) months:

A. Identifiers

A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.

i. For Representatives of Corporate Customers we market our service to:

- Yes, we have collected this type of personal information.
- The purpose of our collection is to use the data to communicate with California residents who are representatives of potential corporate clients and to market to said companies.

ii. For individuals using our service through a corporate account:

- Yes, we collect this type of personal information.
- The purpose is to associate your image and possibly name with an authorized device in a business account.

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

A name, address, credit card number, debit card number, or any other financial information.

i. For Corporate Customers and Potential Corporate Customers:

- Yes, we have collected this type of personal information.
- The purpose of our collection is to process any orders made by representatives of our corporate clients and corporate clients who may be located in California.

ii. For Individuals Who Are Using The Service Through Corporate Accounts:

- Yes, we collect this type of personal information in the form of a name. We do not collect any financial information from individuals users.
- The purpose of this collection is to be able to associate your name with a device in a corporate account so we and the corporate customer know who is using which devices.

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).

i. For Corporate Customers and Potential Corporate Customers:

- No, we do not collect this type of personal information from our corporate clients or their representatives.

ii. For Individuals Who Are Using The Service Through Corporate Accounts:

- No, we do not collect this type of personal information from our corporate clients or their representatives.

D. Commercial information.

Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

i. For Corporate Customers and Potential Corporate Customers:

- Yes, we have collected this type of personal information.
- The purpose of our collection is to keep a record of which corporate customers have purchased our service and facilitate future purchases in the form of renewals.

ii. For Individuals Who Are Using The Service Through Corporate Accounts:

- No, we do not collect this type of personal information.

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.

i. For Corporate Customers and Potential Corporate Customers:

- No, we have not collected this type of personal information.

ii. For Individuals Who Are Using The Service Through Corporate Accounts:

- No, we have not collected this type of personal information.

F. Internet or other similar network activity.

Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

i. For Corporate Customers and Potential Corporate Customers:

- Yes, we collect this type of personal information.
- The purpose of our collection is to gain a better understanding of how representatives of potential and actual corporate clients who are California residents interact with our online properties to improve our offerings and market to said clients.

ii. For Individuals Who Are Using The Service Through Corporate Accounts:

- Yes, we collect this type of personal information.
- The purpose of this collection is to facilitate user interaction with our service such as accessing the service and predetermined programs in the accounts of users.

G. Geolocation data.

Physical location or movements.

i. For Corporate Customers and Potential Corporate Customers:

- No, we do not collect this personal information.

ii. For Individuals Who Are Using The Service Through Corporate Accounts:

- No, we do not collect this type of personal information.

H. Sensory data.

Audio, electronic, visual, thermal, olfactory, or similar information.

i. For Corporate Customers and Potential Corporate Customers:

- No, we do not collect this type of personal information.

ii. For Individuals Who Are Using The Service Through Corporate Accounts:

- No, we do not collect this type of personal information.

I. Professional or employment-related information.

Current or past job history or performance evaluations.

i. For Corporate Customers and Potential Corporate Customers:

- No, we do not collect this type of personal information.

ii. For Individuals Who Are Using The Service Through Corporate Accounts:

- No, we do not automatically collect this type of personal information.

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.

i. For Corporate Customers and Potential Corporate Customers:

- No, we do not collect this type of personal information.

ii. For Individuals Who Are Using The Service Through Corporate Accounts:

- No, we do not collect this type of personal information.

K. Inferences drawn from other personal information.

Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

i. For Corporate Customers and Potential Corporate Customers:

- No, we do not collect this type of personal information.

ii. For Individuals Who Are Using The Service Through Corporate Accounts:

- No, we do not collect this type of 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.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete and services you purchase.
- Indirectly from you. For example, from observing how you use our service.

2. Use of Personal Information

We may use and disclose the personal information we collect from California residents for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question, we will use that personal information to respond to your inquiry.
- To provide, support, personalize, and develop our offerings.
- To market to representatives of corporate customers.
- To create, maintain, customize, and secure accounts with our service.
- To process requests, purchases, transactions, and payments and prevent transactional fraud.
- To personalize experience and to deliver content and product and service offerings relevant to the interests of potential corporate clients, including targeted offers and ads through third-party sites and via email.
- To help maintain the safety, security, and integrity of our website, mobile app, service, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our content and offerings.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described when collecting 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 company assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about California residents 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 personal information to a third party for a business purpose or sell personal information, subject to the right to opt-out of those sales (see Personal Information Sales Opt-Out and Opt-In Rights). When we disclose personal information for a business purpose, we enter 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. The CCPA prohibits third parties who purchase the personal information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

We share personal information with the following categories of third parties:

- Service providers.
- Corporate customers who retain us.

4. Disclosures of Personal Information for a Business Purpose

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

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category D: Commercial information.
- Category F: Internet or other similar network activity.
- Category I: Professional or employment-related information for our staff.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.
- Corporate customers who retain us.

5. Sales of Personal Information

In the preceding twelve (12) months, we have not sold your personal information to third parties. We also do not sell the personal information of individuals under 16 without authorization.

6. Your Rights and Choices

If you are using the Kandji service through a corporate account, please contact the company in question with any request associated with the following rights. Any submission to us will be forwarded to the company associated with your account.

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 (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 or 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.

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. 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 providers 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, or otherwise perform our contract 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.

C. 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:

[Using This Form.](#)

Calling us at (855) 877-1866.

Emailing us at: legal@kandji.io

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. You may also designate a third party to exercise your rights – an authorized agent – however we will require written proof of the authorization and potentially proof of your identity.

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.

D. 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, 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 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, we will select a format to provide your personal information that is readily usable 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:

- 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. Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to legal@kandji.io or write us at:

Mark Daughters, COO
Kandji, Inc.
101 W. Broadway, Suite 550
San Diego, California 92101

9. Changes to Our California 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 app as well as update the notice's effective date. Your continued use of our website or mobile app following the posting of changes constitutes your acceptance of such changes.

10. Contact Information

If you have any questions or comments about this notice, the ways in which Kandji, Inc. collects and uses your information described below [and in the 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:

- Phone: (855) 877-1866
- Website: [Contact Us](#)
- Email: legal@kandji.io

Postal Address:

Mark Daughters, COO
Kandji, Inc.
101 W. Broadway, Suite 550
San Diego, California 92101