

# California Consumer Privacy Act Disclosures

These disclosures are provided by Dita, Inc. (“Company,” “Dita,” or “us”) and apply solely to residents of the State of California (“consumers” or “you”) with respect to personal information Company processes as a business. Any terms defined in the California Consumer Privacy Act of 2018, as amended from time to time, including by the California Privacy Rights Act of 2020 and its implementing regulations (“CCPA”) have the same meaning when used in these disclosures. These disclosures do not reflect our collection, use, or disclosure of California residents’ personal information, or data subject rights, where an exception or exemption under the CCPA applies. You can download a pdf version of these disclosures [[here](#)].

## I. Notice at Collection

We have set out below categories of personal information about that Dita collects from California resident website visitors, corporate representatives of our customers and prospective customers such as retailers and distributors, and vendors and other partners.

### Website Visitors

#### What Categories of Personal Information Do We Collect?

Categories of Non-Sensitive Personal Information
<p><b>Identifiers such as a real 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></p> <p>Specifically including name; alias; username; phone number; email address; IP address; billing address; shipping address; payment information (including credit card number, expiration date, verification code, and/or information for alternate payment types).</p>
<p><b>Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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, but excluding publicly available information that is lawfully made available to the general public from federal, state, or local government records.</b></p> <p><b>(The categories of personal information described in the California Customer Records Act (Cal. Civ. Code § 1798.80(e))</b></p> <p>Specifically including name; alias; username; date of birth; phone number; email address; IP address; billing address; shipping address; payment information (including credit card number, expiration date, verification code, and/or information for alternate payment types); information provided to Dita’s customer service team.</p>
<p><b>Characteristics of protected classifications under California or federal law.</b></p> <p>Specifically including age; gender.</p>
<p><b>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</b></p>

Specifically including products or services purchased, obtained, or considered; purchasing or consuming histories or tendencies.
<b>Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an internet website, application, or advertisement.</b>  Specifically including the type and version of your web browser, device identifier, operating system and platform; IP address; location and time zone setting; cookie information (including the types of cookies you allow us to place on your browser); the pages or products viewed on our website; search terms used on our website or to locate our website from external search engines; your interactions with the website (including the duration of visit, where you scroll on those pages, and where you click); website performance during your visit.
<b>Geolocation data.</b>  Specifically including IP location.
<b>Audio, electronic, visual, thermal, olfactory, or similar information.</b>  Specifically including Zendesk recordings.
<b>Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</b>  Specifically including predictions of characteristics, behavior, attitudes, interests, and preferences.

## **What Criteria Do We Consider When Retaining Personal Information?**

If you have entered into a commercial contract with us, we retain your personal information for as long as the contract is in effect and until any legal rights or obligations related to that contract have expired. If you submit an inquiry to us, we retain your personal information for a reasonable period after we have responded to your inquiry. If you have signed up for promotional information from us, we retain your personal information until you have unsubscribed, after which we retain a record of your decision to unsubscribe so that we can honor your decision. We also retain personal information for as long as applicable laws require us to retain the personal data or for as long as it is relevant to the resolution of any legal claim that may or has been made by or against us. Where more than one of the above conditions applies to personal information, the condition associated with the longest retention period prevails.

## **For What Purposes Do We Collect and Use Personal Information?**

We use non-sensitive personal information about website visitors as reasonably necessary and proportionate to:

- Establish and verify your identity and the accuracy of your information.
- Manage user relationship and communicate with you, including to respond to your inquiries and fulfill your requests.
- Provide you with the information, products, and services you request from us and carry out our obligations arising from any contracts entered into between you and us, including to process, maintain, and service your accounts, process your payment information, ship and fulfill your order, provide you with invoices and/or confirmations, provide customer support, and enable service providers to perform the services on our behalf or assist us with our provision of services to you.

- Measure and understand the effectiveness of the advertising we serve to you and others and deliver relevant advertising to you.
- To the extent permitted by applicable laws, provide you, or allow selected third parties to provide you, with information about goods or services we feel may interest you. You may opt out of receiving marketing communications from us or our affiliates by sending an email to [legal@dita.com](mailto:legal@dita.com), or by unsubscribing through the unsubscribe or opt-out link in an email.
- Administer, facilitate, and improve operations of our sites, including for troubleshooting, data analysis, testing, research, statistical and survey purposes.
- Ensure that content from our sites is presented in the most effective manner for you and your device.
- Engage in research and development efforts to assess the performance of our sites and services, analyze usage, interests, and trends in connection with our sites and services, improve and personalize our sites and services, and develop new products and services.
- Send you administrative information, including information about our sites and changes to our services, terms, conditions, or policies.
- Handle and record consumer rights requests, including opt-ins and opt-outs.
- Monitor and enhance the safety and security of our sites, including to prevent fraud or other unauthorized or illegal activity.
- Conduct internal audits and investigations.
- Comply with laws and regulatory requirements, enforce our terms and conditions, respond to lawful requests, court orders, and legal processes, and protect and defend the rights, property, or safety of us, our affiliates, employees, customers, users, and others.

Please note that we do not sell personal information about California resident website visitors in the sense of exchanging personal information for money. However, we disclose categories of personal information collected about visitors of our website to advertising partners to provide website visitors with more interesting and customized information, promotions, and advertising, which is considered “selling” and “sharing” under the CCPA. Please see our notice of right to opt-out of selling/sharing here: "Do Not Sell or Share My Personal Information // Your Opt-Out Rights." The California Consumer Privacy Act Privacy Policy is in section 2 of these disclosures.

## **Corporate representatives of our customers, prospective customers vendors and other partners**

### **What Categories of Personal Information Do We Collect?**

#### **Non-Sensitive Personal Information:**

- Identifiers such as a real name, alias, postal address, unique personal identifier, email address, account name, or other similar identifiers.
- Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, address, telephone number, employment, employment history, but excluding publicly available information that is lawfully made available to the general public from federal, state, or local government records.
- Commercial information, including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

- Professional or employment-related information.

## **For What Purposes Do We Collect and Use Personal Information?**

We use personal information about you as a corporate representative as reasonably necessary and proportionate for the following purposes:

- To perform the services or provide the goods reasonably expected by you in your role, including those services and goods that are reasonably necessary for us to administer our customer relationships and for our employees to perform their duties;
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information, including in or via our premises, computers, software, networks, communications devices, and other similar system;
- To resist malicious, deceptive, fraudulent or illegal actions directed at us and to prosecute those responsible for those actions;
- For short-term, transient use;
- To perform services on behalf of us;
- To verify or maintain the quality or safety of our services and products;
- To improve, upgrade, or enhance our services and products;
- To market to you; and
- To collect or process it where such collection or processing is not for the purpose of inferring characteristics about a consumer such as to perform functions that are required under laws that apply to us and to support any claim or defense that we could face before any jurisdictional and/or administrative authority, arbitration, or mediation panel, and cooperating with – or informing – law enforcement or regulatory authorities to the extent required by law.

## **What Criteria Do We Consider When Retaining Personal Information?**

In general, with respect to categories of personal information about corporate representatives, we retain each category until we determine that the Company will not be engaged by or engage the customer, vendor, or partner, or if a customer, vendor or partner engages or is engaged by the Company, until the end of such engagement, plus any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up and deletion processes.

We do not sell or share for cross context behavioural advertising any personal information of California resident corporate representatives (except in your role as a website visitor, see above notice for website visitors).

## **II. California Consumer Privacy Act Privacy Policy**

Last Updated: **January 1, 2023**

### **1. OUR PERSONAL INFORMATION HANDLING PRACTICES IN 2022**

We have set out below categories of personal information about California residents we have collected, and as applicable “sold,” “shared,” or disclosed for a business purpose in the preceding 12 months. The table is followed by a description of the purposes for which we collected personal information. Please note that we do not sell personal information about California residents in the sense of exchanging personal information for money. However, we disclosed certain personal information collected to advertising partners to provide website visitors with more interesting and customized

information, promotions, and advertising, as set out below, which is considered “selling” and “sharing” under the CCPA. Please see our notice of right to opt-out of selling/sharing here: "Do Not Sell or Share My Personal Information // Your Opt-Out Rights."

Categories of Non-Sensitive Personal Information	Did we collect? If so, from what source?	Did we sell? If so, to whom and for what purpose?	Did we share? If so, to whom and for what purpose?	Did we disclose? If so, to whom and for what purpose?
<p><b>Identifiers such as a real 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></p> <p>Specifically including name; alias; username; phone number; email address; IP address; billing address; shipping address; payment information (including credit card number, expiration date, verification code, and/or information for alternate payment types).</p>	<p>Yes, directly from you or collected automatically using cookies or similar tracking technologies.</p>	<p>Yes, we may have “sold” the categories of personal information to advertising business partners to support our advertising efforts.</p>	<p>Yes, we may have “shared” the categories of personal information to advertising business partners to support our advertising efforts.</p>	<p>Yes, in addition to the “sales” and “sharing” mentioned in previous columns, we disclosed these types of personal information to our service providers and contractors to receive services from them.</p>
<p><b>Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her 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, but excluding publicly available information that is lawfully made available to the general</b></p>	<p>Yes, directly from you or collected automatically using cookies or similar tracking technologies.</p>	<p>Yes, we may have “sold” the categories of personal information to advertising business partners to support our advertising efforts.</p>	<p>Yes, we may have “shared” the categories of personal information to advertising business partners to support our advertising efforts.</p>	<p>Yes, in addition to the “sales” and “sharing” mentioned in previous columns, we disclosed these types of personal information to our service providers and contractors to receive services from them.</p>

<p><b>public from federal, state, or local government records.</b></p> <p><b>(The categories of personal information described in the California Customer Records Act (Cal. Civ. Code § 1798.80(e))</b></p> <p>Specifically including name; alias; username; date of birth; phone number; email address; IP address; billing address; shipping address; payment information (including credit card number, expiration date, verification code, and/or information for alternate payment types); information provided to Dita’s customer service team.</p>				
<p><b>Characteristics of protected classifications under California or federal law.</b></p> <p>Specifically including age; gender.</p>	<p>Yes, directly from you.</p>	<p>Yes, we may have “sold” the categories of personal information to advertising business partners to support our advertising efforts.</p>	<p>Yes, we may have “shared” the categories of personal information to advertising business partners to support our advertising efforts.</p>	<p>Yes, in addition to the “sales” and “sharing” mentioned in previous columns, we disclosed these types of personal information to our service providers and contractors to receive services from them.</p>
<p><b>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</b></p> <p>Specifically including products or services purchased, obtained, or considered; purchasing or consuming histories or tendencies.</p>	<p>Yes, directly from you or collected automatically using cookies or similar tracking technologies.</p>	<p>Yes, we may have “sold” the categories of personal information to advertising business partners to support our advertising efforts.</p>	<p>Yes, we may have “shared” the categories of personal information to advertising business partners to support our advertising efforts.</p>	<p>Yes, in addition to the “sales” and “sharing” mentioned in previous columns, we disclosed these types of personal information to our service providers and contractors to receive services from them.</p>
<p><b>Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an internet</b></p>	<p>Yes, directly from you or collected automatically using cookies or similar tracking technologies.</p>	<p>Yes, we may have “sold” the categories of personal information to advertising business partners to support our advertising efforts.</p>	<p>Yes, we may have “shared” the categories of personal information to advertising business partners to support our advertising efforts.</p>	<p>Yes, in addition to the “sales” and “sharing” mentioned in previous columns, we disclosed these types of personal information to our service providers and contractors to receive services from them.</p>

<p><b>website, application, or advertisement.</b></p> <p>Specifically including the type and version of your web browser, device identifier, operating system and platform; IP address; location and time zone setting; cookie information (including the types of cookies you allow us to place on your browser); the pages or products viewed on our website; search terms used on our website or to locate our website from external search engines; your interactions with the website (including the duration of visit, where you scroll on those pages, and where you click); website performance during your visit.</p>				
<p><b>Geolocation data.</b></p> <p>Specifically including IP location.</p>	<p>Yes, directly from you or collected automatically using cookies or similar tracking technologies.</p>	<p>Yes, we may have “sold” the categories of personal information to advertising business partners to support our advertising efforts.</p>	<p>Yes, we may have “shared” the categories of personal information to advertising business partners to support our advertising efforts.</p>	<p>Yes, in addition to the “sales” and “sharing” mentioned in previous columns, we disclosed these types of personal information to our service providers and contractors to receive services from them.</p>
<p><b>Audio, electronic, visual, thermal, olfactory, or similar information.</b></p> <p>Specifically including Zendesk recordings.</p>	<p>Yes, directly from you.</p>	<p>No.</p>	<p>No.</p>	<p>Yes, we disclosed these types of personal information to our service providers and contractors to receive services from them.</p>
<p><b>Professional or Employment related information.</b></p>	<p>Yes, directly from you, from references you provided, and recruiting companies.</p>	<p>No.</p>	<p>No.</p>	<p>Yes, we disclosed these types of personal information to our service providers and contractors to receive services from them.</p>
<p><b>Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).</b></p>	<p>Yes, directly from you.</p>	<p>No.</p>	<p>No.</p>	<p>Yes, we disclosed these types of personal information to our service providers and contractors to receive services from them.</p>

<p><b>Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</b></p> <p>Specifically including predictions of characteristics, behavior, attitudes, interests, and preferences.</p>	<p>Yes, directly from you or collected automatically using cookies or similar tracking technologies.</p>	<p>Yes, we may have “sold” the categories of personal information to advertising business partners to support our advertising efforts.</p>	<p>Yes, we may have “shared” the categories of personal information to advertising business partners to support our advertising efforts.</p>	<p>Yes, in addition to the “sales” and “sharing” mentioned in previous columns, we disclosed these types of personal information to our service providers and contractors to receive services from them.</p>
<p><b>Categories of Sensitive Personal Information</b></p>	<p><b>Did we collect? If so, from what source?</b></p>	<p><b>Did we sell? If so, to whom and for what purpose?</b></p>	<p><b>Did we share? If so, to whom and for what purpose?</b></p>	<p><b>Did we disclose? If so, to whom and for what purpose?</b></p>
<p><b>A consumer’s social security, driver’s license, state identification card, or passport number.</b></p>	<p>Yes, directly from you.</p>	<p>No.</p>	<p>No.</p>	<p>Yes, we disclosed these types of personal information to our service providers and contractors to receive services from them.</p>
<p><b>A consumer’s precise geolocation.</b></p> <p>Specifically including IP addresses to the extent these correctly identify the precise geolocation in which a remote user of our IT systems is located.</p>	<p>Yes, directly from you.</p>	<p>No.</p>	<p>No.</p>	<p>Yes, we disclosed these types of personal information to our service providers and contractors to receive services from them.</p>
<p><b>The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.</b></p>	<p>Yes, directly from you or collected automatically as part of use of information security technologies.</p>	<p>No.</p>	<p>No.</p>	<p>Yes, we disclosed these types of personal information to our service providers and contractors to receive services from them.</p>
<p><b>Personal information collected and analyzed concerning a consumer’s health.</b></p> <p>Specifically including prescription information to be able to fill eyewear prescriptions and related to voluntarily provided disability information.</p>	<p>Yes, directly from you.</p>	<p>No.</p>	<p>No.</p>	<p>Yes, we disclosed these types of personal information to our service providers and contractors to receive services from them.</p>



## 2. BUSINESS OR COMMERCIAL PURPOSE FOR COLLECTING PERSONAL INFORMATION

- Establish and verify consumer identity and the accuracy of consumer information.
- Manage user relationship and communicate with consumers, including to respond to consumer inquiries and fulfill consumer requests.
- Provide consumers with the information, products, and services consumers request from us and carry out our obligations arising from any contracts entered into between consumers and us, including to process, maintain, and service consumer accounts, process consumer payment information, ship and fulfill consumer order, provide consumers with invoices and/or confirmations, provide customer support, and enable service providers to perform the services on our behalf or assist us with our provision of services to consumers.
- Measure and understand the effectiveness of the advertising we serve to consumers and others and deliver relevant advertising to consumers.
- To the extent permitted by applicable laws, provide consumers, or allow selected third parties to provide consumers, with information about goods or services we feel may interest consumers.
- Administer, facilitate, and improve operations of our sites, including for troubleshooting, data analysis, testing, research, statistical and survey purposes.
- Ensure that content from our sites is presented in the most effective manner for consumers and their devices.
- Engage in research and development efforts to assess the performance of our sites and services, analyze usage, interests, and trends in connection with our sites and services, improve and personalize our sites and services, and develop new products and services.
- Send consumers administrative information, including information about our sites and changes to our services, terms, conditions, or policies.
- Handle and record consumer rights requests, including opt-ins and opt-outs.
- Monitor and enhance the safety and security of our sites, including to prevent fraud or other unauthorized or illegal activity.
- Conduct internal audits and investigations.
- Comply with laws and regulatory requirements, enforce our terms and conditions, respond to lawful requests, court orders, and legal processes, and protect and defend the rights, property, or safety of us, our affiliates, employees, customers, users, and others.
- To perform the services or provide the goods reasonably expected by consumers in their role, including those services and goods that are reasonably necessary for us to administer our customer and employment relationships and for our employees to perform their duties;
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information, including in or via our premises, computers, software, networks, communications devices, and other similar system;
- To resist malicious, deceptive, fraudulent or illegal actions directed at us and to prosecute those responsible for those actions;
- For short-term, transient use;
- To perform services on behalf of us;
- To verify or maintain the quality or safety of our services and products;

- To improve, upgrade, or enhance our services and products;
- To market to consumers; and
- To collect or process it where such collection or processing is not for the purpose of inferring characteristics about a consumer such as to perform functions that are required under laws that apply to us and to support any claim or defense that we could face before any jurisdictional and/or administrative authority, arbitration, or mediation panel, and cooperating with – or informing – law enforcement or regulatory authorities to the extent required by law.

We do not have actual knowledge that we sell or share for cross context behavioural advertising the personal information of California residents under 16 years of age.

### 3. CCPA RIGHTS

As a California resident, you have the following rights under the CCPA:

- The **right to know** what personal information we have collected about you, including the categories of personal information; the categories of sources from which the personal information is collected; the business or commercial purpose for collecting, selling, or sharing personal information; the categories of third parties to whom we disclose personal information; and the specific pieces of personal information we have collected about you. You may only exercise your right to know twice within a 12-month period.
- The **right to delete** personal information that we have collected from you, subject to certain exceptions.
- The **right to correct** inaccurate personal information that we maintain about you.
- The **right to opt-out of the sale or sharing** of your personal information by us. We disclose California residents' personal information to advertising business partners for the purposes of advertising efforts and, as such, we "sell" and "share" personal information as these terms are defined under the CCPA. Please note that we do not sell personal information in the sense of disclosing your personal information in exchange for money. Please also note that, if you exercise your right to opt-out of the "sharing" of your personal information, we may still disclose your personal information to third parties for purposes other than cross-contextual behavioral advertising, as described in our privacy disclosures.
- The **right to limit** our use and disclosure of sensitive personal information to purposes specified in 1798.121(a) of the CCPA. We do not use or disclose sensitive personal information for purposes other than those specified in 1798.121 (a) of the CCPA.
- The **right not to receive discriminatory treatment** by the business for the exercise of privacy rights conferred by the CCPA, in violation of California Civil Code § 1798.125, including an employee's, applicant's, or independent contractor's right not to be retaliated against for the exercise of their CCPA rights.

### 4. HOW TO EXERCISE CCPA RIGHTS

#### Methods of Submission and Instructions:

- To submit a request to exercise your **rights to know, delete or correct**, please email [legal@dita.com](mailto:legal@dita.com), call (888) 245-2202 (toll free),
- To submit a request to exercise your **right to opt-out of “sales” and “sharing,”** please click here: "[Do Not Sell or Share My Personal Information // Your Opt-Out Rights](#)".

**Verification:** Only you, or someone legally authorized to act on your behalf, may make a request related to your personal information. You may designate an authorized agent by taking the steps outlined under “Authorized Agent” below. In your request or in response to us seeking additional information, you, or your authorized agent, must provide sufficient information to allow us to reasonably verify that you are, in fact, the person whose personal information was collected,

which will depend on your prior interactions with us and the sensitivity of the personal information being requested. We may ask you for information to verify your identity and, if you do not provide enough information for us to reasonably verify your identity, we will not be able to fulfil your request. We will only use the personal information you provide to us in a request for the purposes of verifying your identity and to fulfill your request.

**Opt-Out Preference Signals:** We respond to opt-out preference signals communicated via the Global Privacy Control and will process such signals with respect to the browser or device communicating the signals, or with respect to you specifically if you have signed onto your Dita account while communicating Global Privacy opt-out preference signals. To use Global Privacy Control opt-out preference signals, please follow the instructions here: <https://globalprivacycontrol.org/>.

**Authorized Agents:** You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity and the agent provides proof that you gave the agent signed permission to submit the request; and
- You directly confirm with Company that you provided the authorized agent with permission to submit the request.

If you provide an authorized agent with the power of attorney pursuant to Probate Code sections 4121 to 4130, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

## 5. CONTACT US

If you have any questions or comments about these disclosures or our practices, please contact us at:

Dita, Inc.

Email address: [legal@dita.com](mailto:legal@dita.com)

Postal address: 1 Columbia, Aliso Viejo, CA 92656, United States