

Effective Date: January 1, 2023

Last Reviewed/Revised on: January 1, 2023

This Notice at Collection and Privacy Policy (“Privacy Disclosure”) explains how BNI Global, LLC and its subsidiaries and affiliates (“Company”, “us”, “our”, or “we”) collect, use, disclose, and/or retain personal information (“Information Practices”) subject to the California Consumer Privacy Act (“CCPA”). This Privacy Disclosure applies solely to California residents (“consumers” or “you”).

This Privacy Disclosure does not apply to information we collect in the context of a California individual’s interaction with us as a job applicant, employee, contractor, or other role within our Company. Please refer to our *Workforce* CCPA Disclosure.

Notice at Collection and Privacy Policy for California Residents

Notice at Collection

The following notice identifies the categories of personal information to be collected from you and the purposes for which the personal information will be used, including whether that information is sold or shared.

General Personal Information

Categories of Personal Information	Purposes for Collection and Use	Sold to Third Parties or Shared with Third Parties for Cross-Context Behavioral Advertising	Retention Periods
Identifiers: For example, a name, address, Internet Protocol address, email address, or other similar identifiers.	<ul style="list-style-type: none">to verify your identity, register you as a user, and create your user account with us on a platform or serviceto provide the servicesto enable the provision of Professional Services, including to send you information and updates about the Professional Services you have purchased.	We disclose your IP address to third parties with your consent. Please review our cookie policy for more information about your choices.	We retain these categories for the duration of our interaction with you as a member, as a user of our services or other interaction between you and us, and for up to 10 years after the date of our last interaction with you.
Personal Information Categories from Cal. Civ. Code § 1798.80(e): For example, a name, signature, telephone number, state or federal identification, financial information.	<ul style="list-style-type: none">to monitor trends and personalize your experienceto improve the functionality of our Services and Platformfor customer serviceto respond to your requests and support needs.	No	
Characteristics of CA or Federal Protected Classifications: For example, your gender.	<ul style="list-style-type: none">to track transactions and process payments	No	

<p>Commercial Information: For example, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> to send periodic notifications to manage our relationship with you, including to notify you of changes to the Services, send you information and updates pertaining to the Services you have used, and receive occasional company news and updates related to us or the Services 		
<p>Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement</p>	<ul style="list-style-type: none"> to market and advertise the Services to you to comply with legal obligations to administer and protect our business and the Services, including for troubleshooting, data analysis, system testing, and perform internal operations to improve our business and delivery models to perform our obligations that arise out of the arrangement we are about to enter or have entered with you 	<p>We disclose this category to third parties with your consent. Please review our cookie policy for more information about your choices.</p>	<p>Please review our cookie policy which lists our retention policy for each cookie.</p>
<p>Professional or Employment-Related Information: For example, your current or past employers.</p>	<ul style="list-style-type: none"> to enforce our Terms to respond to court orders, establish or exercise legal rights, and bring or defend ourselves against legal claims 	<p>No</p>	<p>We retain these categories for the duration of our interaction with you as a member, as a user of our services or other interaction between you and us, and for up to 10 years after the date of our last interaction with you.</p>
<p>Profile Data: For example, inferences drawn from personal information to create a profile about a consumer reflecting the consumer’s preferences, characteristics, predispositions, behavior, attitudes, abilities, and aptitudes.</p>	<ul style="list-style-type: none"> with your consent or as otherwise disclosed at the time information is collected. 	<p>No</p>	

We do not collect: Biometric information, geolocation data, sensory or surveillance data, or education information under this policy.

Sensitive Personal Information

Categories of Sensitive Personal Information	Purposes for Collection and Use	Retention Policy
Account log-in, password, or credentials allowing access to an account	We collect and use this information when you sign up for an account on our website.	We retain these categories for the duration of our interaction with you as a member, as a user of our services or other interaction between you and us, and for up to 10 years after the date of our last interaction with you.

We do not collect: Social security number, driver’s license, state identification card, or passport number, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, or union membership, contents of a consumer’s mail, email, and text messages (unless we are the intended recipient of the communication), genetic data, biometric information for the purpose of unique identification, health information, information concerning sex life or sexual orientation.

Retention Periods

We retain information for different periods of time depending on the purposes for which we collect and use it. We will delete or de-identify information when it is no longer needed to fulfill the purposes listed for each category above unless a longer retention period is required to comply with applicable laws. There may be technical or other operational reasons where we are unable to fully delete or de-identify your information. Where this is the case, we will take reasonable measures to prevent further processing your information.

We do not sell or share any personal information without your consent.

PRIVACY POLICY

The purpose of this privacy policy is to provide you with a comprehensive description of our online and offline Information Practices. You have certain rights to control the use of your personal information. This privacy policy describes your rights as it relates to our Information Practices as your personal information and how you can exercise those rights.

The following table includes disclosures for the preceding 12 months of: categories of personal information we have collected about consumers, the categories we have disclosed for a business purpose, and categories of third parties with whom we shared the personal information during that period.

General Personal Information

Category	In the preceding 12 months this category was:		Business or Commercial Purpose for Collection & Disclosure	Categories of third parties to whom the information was disclosed
	Collected	Disclosed		
Identifiers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • For our operational purposes or the operational purposes of our service provider or contractors • Keeping track of visitors to our website and monitoring the effectiveness of our advertising, including auditing relating to counting ad impressions of unique visitors, verifying positioning and quality, and auditing compliance. • Ensuring security and integrity as needed and as reasonably necessary and proportionate for this purpose • Debugging to identify and repair errors that impair existing functionality • Short-term, transient use • Performing services on behalf of the business, including maintaining or servicing accounts, providing products or services, providing customer service, processing orders or transactions, verifying customer information, processing payments, providing financing, providing analytic services, storage, or other similar services. • Providing advertising and marketing services, except for cross-contextual advertising. • Undertaking internal research for technological development. • Undertaking activities to verify or maintain quality or safety of a service or device and to improve or enhance a service or device. 	<ul style="list-style-type: none"> • Advertising networks • Internet service providers • Data analytics providers • Government entities • Operating systems and platforms • Social networks • Cloud storage providers • Payment processors • Web hosting service providers • E-mail distribution service providers • Help Desk service providers • Financial and accounting service providers • Cybersecurity service providers • Logistics and planning tool providers • Customer relationship management tool providers
Personal Information Categories from Cal. Civ. Code § 1798.80(e)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Characteristics of CA or Federal Protected Classifications	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Commercial Information	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Internet or Other Similar Network Activity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Professional or Employment-Related Information	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Profile Data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

We do not collect: Biometric information, geolocation data, sensory or surveillance data, or education information under this policy.

Sensitive Personal Information

We do not use or disclose the below sensitive personal information for purposes other than those business purposes specifically enumerated under CCPA. As a result, we do not offer a right to limit our use or disclosure of these categories of sensitive personal information.

Category	In the preceding 12 months this category was:		Business or Commercial Purpose for Collection & Disclosure	Categories of third parties to whom the information was disclosed
	Collected	Disclosed		
Account log-in, password, or credentials allowing access to an account	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> • To perform services or provide goods you request and reasonably expect from us • To detect, prevent, and investigate security incidents involving your information • To investigate or curtail malicious, fraudulent, or illegal actions directed at us and to prosecute those responsible • To ensure the safety of you and others • To enhance your experience on our website in real time, so long as we do not disclose your information to a third party • To perform services for our business needs such as maintaining accounts, providing customer service, and fulfill orders • To ensure the quality or safety of a product, service, or device • To collect or process sensitive personal information where such information is not being used to infer characteristics about you but may be used to provide a specific good or service based on the sensitive information you provided 	None

We do not collect: Social security number, driver’s license, state identification card, or passport number, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, or union membership, contents of a consumer’s mail, email, and text messages (unless we are the intended recipient of the communication), genetic data, biometric information for the purpose of unique identification, health information, information concerning sex life or sexual orientation.

The categories identified as collected in the tables above were collected from the following categories of sources:

- You directly
- Advertising networks

- Internet service providers
- Data analytics providers
- Government entities
- Operating systems and platforms
- Social networks
- Data brokers

We do not sell any personal information or share with third parties for cross-context behavioral advertising personal information to third parties without your consent. Please review our [cookie policy](#) for more information on your choices. We do not sell or share sensitive personal information.

Your Right to Know

You have the right to request that we disclose any of the following:

- the categories of personal information we have collected about you
- the categories of sources from which the personal information is collected
- the business or commercial purpose for collecting, selling, or sharing with third parties for cross context behavioral advertising (e.g. targeted advertising)
- the categories of third parties to whom we disclose personal information
- the specific pieces of personal information we have collected about you

You can do this through a verified consumer request. That process is described below in the section, “Submitting a Verified Consumer Request.”

Your Right to Request Correction of Inaccurate Personal Information

You have the right to request correction of inaccurate personal information maintained by us. We may request documentation from you to determine the accuracy of the information. If you provide us documentation either upon our request or through your own initiative, that documentation will only be used for the purpose of correcting your personal information and complying with our recordkeeping requirements. We may deny your request if we have previously denied your same request to correct an alleged inaccuracy in the past six (6) months, unless you provide new or additional documentation that the information at issue is inaccurate.

As an alternative to correction, we may delete the inaccurate information if it does not negatively impact you or if you consent to this deletion. We reserve the right to deny this request if allowed under law, or if we determine that the contested information is more likely than not accurate, based on the totality of circumstances. You can submit a correction request through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

Your Right to Request Deletion of Your Personal Information

You have the right to request that we delete any of your personal information collected by us, subject to certain exceptions. You can do this through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

There may be scenarios where we deny your deletion request. If that occurs, we will provide you with an explanation as to why we could not delete all or some of your personal information.

How to Exercise Your Rights -- Submitting a Verified Consumer Request

You have the right to submit verified consumer requests to know information, to correct information, or for deletion. The response to a request to know will provide all personal information collected and maintained about you since January 1, 2022, unless doing so proves impossible or would involve disproportionate effort. Please note that we are not required to provide personal information to you more than twice in a 12-month period. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

If you have an account with us, you can exercise certain of your rights through that account.

You can also submit requests by calling us at 1-888-346-8459 or by emailing us at usprivacy@bni.com.

If you submit a request that is not through one of these designated methods or is deficient in some manner unrelated to verification, we will provide you with information on how to submit the request or remedy any deficiencies.

Your request will be verified by matching the information you provide to information that we have collected.

Once we receive your verifiable consumer request, we will confirm receipt of the request within 10 business days describing our verification process. We will respond to your request within 45 calendar days, if we are able to verify your identity. Requests for deletion will require a separate confirmation that you want your information deleted.

Requests to Know or Delete for Child Under the Age of 13: We do not knowingly collect information of minors under the age of 13.

Using an Authorized Agent to Submit a Request

Only you, or a natural person or a business entity registered with the Secretary of State to conduct business in California that you have 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. If you use an authorized agent, you may provide a power of attorney executed pursuant to California Probate Code sections 4000 to 4465. If a power of attorney that meets those provisions is not submitted, you will be required to provide the authorized agent signed permission to submit a request, verify your identity directly with us, and directly confirm with us that you provided the authorized agent permission to submit the request.

If you're an authorized agent making a request, you need to do the following:

- (a) e-mail a copy of a power of attorney provided to you by the consumer pursuant to Probate Code sections 4000 to 4465; or
- (b) e-mail proof of signed permission along with a copy of your ID and have the consumer direct confirm with us that they provided you permission to submit the request by sending an e-mail.

Opt-Out Preference Signals

Except for necessary cookies (which must be enabled for the website to work properly), all other cookies and website trackers are turned off and non-functional when you visit our website. Those cookies and trackers will not be enabled without your consent and consent can be revoked at any time. Please review our [cookie policy](#) for more information on your choices.

Your Right to Non-Discrimination for the Exercise of a Privacy Right

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.

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 usprivacy@bni.com.

Company does not respond to Web browser "do not track" signals or other mechanisms.

Other parties may collect personally identifiable information about your activities over time and across different Web sites when a consumer uses our Web site or service.

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 for More Information

If you have any questions or comments about this notice, the ways in which we collect and use your information, 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: 1-888-346-8459

Email: usprivacy@bni.com

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