

California Consumer Privacy Act Disclosures

These disclosures are provided by Slalom, Inc. (“Company”) and applies 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 [\[here\]](#).

1. Notice at Collection Online

We have set out below categories of personal information about California residents we collect online. We do not sell or share for cross context behavioural advertising any personal information of California residents. The California Consumer Privacy Act Privacy Policy is in section 2 of these disclosures.

Categories of Non-Sensitive Personal Information	Retention Time
<p>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.</p> <p>Specifically, name, address, e-mail address, technical information, including the domain and host name from which you access the Internet, the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone and country setting, browser plug-in types and versions, operating system and platform.</p>	Your personal information will be retained for as long as necessary for the purposes for which it was collected, which in most cases do not exceed 5 years, plus any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up, and deletion processes.
<p>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.</p>	Your personal information will be retained for as long as necessary for the purposes for which it was collected, which in most cases do not exceed 5 years, plus any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up, and deletion processes.

<p>(The categories of personal information described in the California Customer Records Act (Cal. Civ. Code § 1798.80(e))</p> <p>Specifically: phone number</p>	
<p>Commercial information, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p> <p>Specifically, services you purchased and services you considered.</p>	<p>Your personal information will be retained for as long as necessary for the purposes for which it was collected, which in most cases do not exceed 5 years, plus any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up, and deletion processes.</p>
<p>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.</p> <p>Specifically: technical information, including the domain and host name from which you access the Internet, the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone and country setting, browser plug-in types and versions, operating system and platform; information about your site visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page</p>	<p>Your personal information will be retained for as long as necessary for the purposes for which it was collected, which in most cases do not exceed 5 years, plus any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up, and deletion processes.</p>
<p>Geolocation data.</p> <p>Specifically: location you provide to us.</p>	<p>Your personal information will be retained for as long as necessary for the purposes for which it was collected, which in most cases do not exceed 5 years, plus any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up, and deletion processes.</p>
<p>Audio, electronic, visual, thermal, olfactory, or similar information.</p>	<p>Your personal information will be retained for as long as necessary for the purposes for which it was collected, which in most cases do not exceed 5</p>

<p>Specifically: complaints received in audio recordings (i.e., telephone calls).</p>	<p>years, plus any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up, and deletion processes.</p>
<p>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.</p> <p>Specifically: predictions of characteristics, behavior, attitudes, interests, and preferences.</p>	<p>Your personal information will be retained for as long as necessary for the purposes for which it was collected, which in most cases do not exceed 5 years, plus any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up, and deletion processes.</p>
<p>Categories of Sensitive Personal Information</p>	<p>Retention Time</p>
<p>A consumer’s social security, driver’s license, state identification card, or passport number</p> <p>Specifically, social security, driver’s license, passport, and other identification numbers and copies of documentation</p>	<p>Your personal information will be retained for as long as necessary for the purposes for which it was collected, which in most cases do not exceed 5 years, plus any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up, and deletion processes.</p>
<p>A consumer’s account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.</p> <p>Specifically, bank account and other payment details</p>	<p>Your personal information will be retained for as long as necessary for the purposes for which it was collected, which in most cases do not exceed 5 years, plus any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up, and deletion processes.</p>
<p>A consumer’s precise geolocation.</p> <p>Specifically, precise geolocation of devices assigned to you</p>	<p>Your personal information will be retained for as long as necessary for the purposes for which it was collected, which in most cases do not exceed 5 years, plus any additional time periods necessary for the compliance with laws, exercise or defense of legal</p>

	rights, and archiving, back-up, and deletion processes.
<p>The contents of a consumer’s mail, email, and text messages unless the business is the intended recipient of the communication.</p> <p>Specifically, electronic communications</p>	Your personal information will be retained for as long as necessary for the purposes for which it was collected, which in most cases do not exceed 5 years, plus any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up, and deletion processes.
<p>The processing of biometric information for the purpose of uniquely identifying a consumer.</p> <p>Specifically, facial recognition and other biometrics information within certain Slalom events.</p>	Your personal information will be retained for as long as necessary for the purposes for which it was collected, which in most cases do not exceed 5 years, 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 use non-sensitive personal information about website visitors:

- To monitor and maintain the performance of the sites and to analyze trends, usage and activities in connection with the sites;
- To measure the effectiveness of advertising we serve to you;
- As part of our efforts to keep our site safe and secure;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them;
- To deliver relevant advertising to you;
- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To provide you with information about other goods and services we offer that are similar to those that you have already purchased or inquired about;

- To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. We will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you, or where you have consented to this, or where we can otherwise lawfully do so;
- To notify you about changes to our service;
- To ensure that content from our site is presented in the most effective manner for you and for your computer;
- To provide you with certain experiences during a client or other marketing event; and
- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

We use sensitive personal information about our website visitors:

- To perform the services or provide the goods reasonably expected by our website visitors;
- 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;
- To ensure the physical safety of natural persons;
- 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;
- For purposes that do not infer characteristics about the consumer; and
- To perform functions that are required under laws that apply to us.

2. California Consumer Privacy Act Privacy Policy

Last Updated: January 1, 2023

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 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. In

the preceding 12 months we did not sell or share for cross context behavioural advertising, the personal information of California residents.

Category of personal information	We collected such personal information to use for the following business or commercial purposes:	We have collected such personal information from the following categories of sources:	We shared such personal information with the following categories of third parties:
<i>Non Sensitive Personal Information</i>			
<p>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.</p> <p>Specifically, name, address, e-mail address, technical information, including the domain and host name from which you access the Internet, the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone and country setting, browser plug-in types and versions, operating system and platform.</p>	<p>To monitor and maintain the performance of the sites and to analyze trends, usage and activities in connection with the sites, to measure the effectiveness of advertising we serve to you, and to deliver relevant advertising to you.</p>	<p>Directly from the California resident, cookies or lead generation service providers.</p>	<p>Cloud hosting and internet service providers, government entities, operating systems and platform providers, and certain technology partners.</p>
<p>Any information that identifies, relates to, describes, or is</p>	<p>To monitor and maintain the performance of the</p>	<p>Directly from the California resident, cookies or lead</p>	<p>Cloud hosting and internet service providers,</p>

<p>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. (The categories of personal information described in the California Customer Records Act (Cal. Civ. Code § 1798.80(e))</p> <p>Specifically, phone number</p>	<p>sites and to analyze trends, usage and activities in connection with the sites, to measure the effectiveness of advertising we serve to you, and to deliver relevant advertising to you; to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us; to provide you with information about other goods and services we offer that are similar to those that you have already purchased or inquired about; to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. We will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you, or where you have consented to this, or where we can otherwise lawfully do</p>	<p>generation service providers.</p>	<p>government entities, operating systems and platform providers, and certain technology partners.</p>
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	<p>so; to notify you about changes to our service; and to ensure that content from our site is presented in the most effective manner for you and for your computer</p>		
<p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p> <p>Specifically, services you purchased and services you considered</p>	<p>To monitor and maintain the performance of the sites and to analyze trends, usage and activities in connection with the sites, to measure the effectiveness of advertising we serve to you, and to deliver relevant advertising to you; to provide you with information about other goods and services we offer that are similar to those that you have already purchased or inquired about; and to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. We will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you, or where you have consented to</p>	<p>Directly from the California resident.</p>	<p>Certain technology partners.</p>

	this, or where we can otherwise lawfully do so.		
<p>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.</p> <p>Specifically, technical information, including the domain and host name from which you access the Internet, the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone and country setting, browser plug-in types and versions, operating system and platform; information about your site visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page</p>	<p>To monitor and maintain the performance of the sites and to analyze trends, usage and activities in connection with the sites, to measure the effectiveness of advertising we serve to you, and to deliver relevant advertising to you; to provide you with information about other goods and services we offer that are similar to those that you have already purchased or inquired about; to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. We will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you, or where you have consented to this, or where we can otherwise lawfully do so; and to ensure that content from our site is presented in the</p>	<p>Through our use of cookies.</p>	

<p>interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page</p>	<p>most effective manner for you and for your computer.</p>		
<p>Geolocation data. Specifically, location you provide to us, location based on your IP address.</p>	<p>To provide connectivity</p>	<p>Directly from the California resident, cookies or lead generation service providers.</p>	
<p>Audio, electronic, visual, thermal, olfactory, or similar information. Specifically, complaints received in audio recordings (i.e., telephone calls)</p>	<p>To provide you with certain experiences during a client or other marketing event; and to respond to complaints</p>	<p>Directly from the California resident.</p>	
<p>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. Specifically, predictions of characteristics, behavior, attitudes, interests, and preferences</p>	<p>To provide you with information about other goods and services we offer that are similar to those that you have already purchased or inquired about; to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. We will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you, or where you</p>	<p>Directly from the California resident, cookies or lead generation service providers.</p>	<p>IT and security staff as well as external vendors; employees of other departments and outside third parties, including, but not limited to (i) employees in our HR, internal audit, compliance and legal departments; (ii) information technology service providers, and (iii) external advisors (law firms, auditors, etc.) or public authorities (for instance, in the course of investigations or mergers or acquisitions). We may also disclose personal information</p>

	have consented to this, or where we can otherwise lawfully do so; and to ensure that content from our site is presented in the most effective manner for you.		to government officials on demand.
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Sensitive Personal Information

<p>A consumer’s social security, driver’s license, state identification card, or passport number</p> <p>Specifically, social security, driver’s license, passport, and other identification numbers and copies of documentation</p>	For authentication purposes and to comply with tax and immigration law.	Directly from the California resident.	IT and security staff as well as external vendors; employees of other departments and outside third parties, including, but not limited to (i) employees in our HR, internal audit, compliance and legal departments; (ii) information technology service providers, and (iii) external advisors (law firms, auditors, etc.) or public authorities (for instance, in the course of investigations or mergers or acquisitions). We may also disclose personal information to government officials on demand.
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<p>A consumer’s account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or</p>	To pay your compensation or process your payments.	Directly from the California resident.	IT and security staff as well as external vendors; employees of other departments and outside third parties, including, but not limited to (i) employees in our HR, internal audit,
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<p>credentials allowing access to an account.</p> <p>Specifically, bank account and other payment details</p>			<p>compliance and legal departments; (ii) information technology service providers, and (iii) external advisors (law firms, auditors, etc.) or public authorities (for instance, in the course of investigations or mergers or acquisitions). We may also disclose personal information to government officials on demand.</p>
<p>A consumer's precise geolocation.</p> <p>Specifically, precise geolocation of devices assigned to you</p>	<p>To provide connectivity, find you in an emergency, investigate legal issues, and retrieve lost or stolen devices.</p>	<p>From the device.</p>	<p>IT and security staff as well as external vendors; employees of other departments and outside third parties, including, but not limited to (i) employees in our HR, internal audit, compliance and legal departments; (ii) information technology service providers, and (iii) external advisors (law firms, auditors, etc.) or public authorities (for instance, in the course of investigations or mergers or acquisitions). We may also disclose personal information to government officials on demand.</p>

<p>The contents of a consumer’s mail, email, and text messages unless the business is the intended recipient of the communication.</p> <p>Specifically, electronic communications</p>	<p>For purposes of quality control, training, and compliance with law and company policies.</p>	<p>From monitoring systems.</p>	<p>IT and security staff as well as external vendors; employees of other departments and outside third parties, including, but not limited to (i) employees in our HR, internal audit, compliance and legal departments; (ii) information technology service providers, and (iii) external advisors (law firms, auditors, etc.) or public authorities (for instance, in the course of investigations or mergers or acquisitions). We may also disclose personal information to government officials on demand.</p>
<p>The processing of biometric information for the purpose of uniquely identifying a consumer.</p> <p>Specifically, facial recognition and other biometrics information</p>	<p>To provide you with certain experiences during a client or other marketing event and for authentication and security purposes.</p>	<p>Directly from the California resident.</p>	<p>IT and security staff as well as external vendors; employees of other departments and outside third parties, including, but not limited to (i) employees in our HR, internal audit, compliance and legal departments; (ii) information technology service providers, and (iii) external advisors (law firms, auditors, etc.) or public authorities (for instance, in the</p>

			course of investigations or mergers or acquisitions). We may also disclose personal information to government officials on demand.
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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.

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 do not sell or share for cross-context behavioral advertising any of the categories of personal information that we collect about California residents.
- The **right to limit** our use and disclosure of sensitive personal information to purposes specified in subsection 7027(m) of the California Consumer Privacy Act Regulations. We do not use or disclose sensitive personal information for purposes other than those specified in subsection 7027(m) of the California Consumer Privacy Act Regulations.
- 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.

How to Exercise CCPA Rights

Methods of Submission and Instructions: To submit a request to exercise your **rights to know, delete or correct**, please call our toll-free phone number (855) 256-3238 or submit an email request to privacy@slalom.com and include “California Request to [Know, Delete or Correct]” in the subject line..

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" further 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 will ask that you provide certain information to verify your identity, such as a code sent to an email address we may have on file for you. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. If you do not provide enough information for us to reasonably verify your identity, we will not be able to fulfill 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. If we deny your request, we will explain why.

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 use an authorized agent to submit a request to exercise your right, please have the authorized agent take the following steps in addition to the steps above:

- Mail a certified copy of your written declaration authorizing the authorized agent to act on your behalf to 821 2nd Avenue, Suite 1900, Seattle, WA 98104 United States; and
- Provide any information we request in our response to your email to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue.

If you provide an authorized agent with 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.

Contact Us

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

Email address: privacy@slalom.com

Postal address:

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