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**CCPA Privacy Policy**  
**(California Consumer Privacy Act)**

**Document Number:**

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## **Objective**

The purpose of this policy is to maintain the privacy of consumers and protect the private data of employees, contractors, vendors, interns, associates, customers and business partners of Net2Source. Inc (for California residents) and to protect the terms of how their personal information can be used by for-profit enterprises. We also want to ensure compliance with laws and regulations applicable to Net2Source.Inc (hereafter referred to as “**NET2SOURCE**” or “**the organization**”).

## **Scope**

This policy is applicable to all NET2SOURCE employees, contractors, vendors, interns, associates, customers and business partners residing in California who may receive personal information, have access to personal information collected or processed, or who provide information to the organization.

This Policy applies to all NET2SOURCE employees, contractors, vendors, interns, associates, customers and business partners residing in California who receive personal information from NET2SOURCE, who have access to personal information collected or processed by NET2SOURCE, or who provide information to NET2SOURCE. All employees of the organization who reside in California are expected to support the privacy policy and principles when they collect and / or handle personal information belonging to California resident or are involved in the process of maintaining or disposing of personal information.

All partner firms and any Third-Party working with or for NET2SOURCE, and who have or may have access to personal information of residents belonging to California, will be expected to have read, understand and comply with this policy. No Third Party may access personal information held by the organization without having first entered into a confidentiality agreement.

## **Categories of Personal Information Collected by NET2SOURCE**

NET2SOURCE collects 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. The following is a list of categories of personal information which NET2SOURCE may collect or may have been collected from California residents within the last twelve (12) months.

The categories and examples provided in the list below are those defined in the CCPA (The California Consumer Privacy Act). This does not mean that all examples of that category of personal information were in fact collected by the organization but reflects the organization's good faith belief to the best of its knowledge that some of that information from the applicable category may be and may have been collected.

- **Category A: Identifiers.**

Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers.

Collected: Yes.

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

Examples: A 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. Some personal information included in this category may overlap with other categories.

Collected: Yes

- **Category C: Protected classification characteristics under California or federal law.**

Examples: 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).

Collected: Yes

- **Category D: Commercial information.**

Examples: Records and history of products or services purchased or considered.

Collected: Yes/No

- **Category E: Biometric information**

Examples: 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.

Collected: Yes/No

- **Category F: Internet or other similar network activity**

Examples: Interaction with our Service or advertisement.

Collected: Yes/No

- **Category G: Geolocation data**



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Examples: Approximate physical location.

Collected: Yes/No

- **Category H: Sensory data**

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

Collected: Yes/No

- **Category I: Professional or employment-related information**

Examples: Current or past job history or performance evaluations

Collected: Yes

- **Category 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)).**

Examples: 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.

Collected: Yes.

- **Category K: Inferences drawn from other personal information.**

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

Collected: Yes.

Under CCPA, personal information does not include:

- Publicly available information from government records
- Deidentified or aggregated consumer information
- Information excluded from the CCPA's scope, such as:
  - 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

## Sources of Personal Information

NET2SOURCE obtains the categories of personal information listed above from the following categories of sources:

- Directly. For example, from the forms the California residents complete on the organization's Service, preferences the California residents express or provide through the organization's Service, or from requirement from the organization on its Service, or from CV's



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sent by the candidate directly.

- Indirectly. For example, from observing California resident's activity on organization's Service.
- Automatically. For example, through cookies organization or Service Providers set on the California resident's Device as he/she navigates through organization's Service.
- From Service Providers. For example, third-party vendors to monitor and analyze the use of organization's Service, third-party vendors for payment processing, or other third-party vendors that organization uses to provide the Service.

### **Use of Personal Information for Business Purposes or Commercial Purposes**

NET2SOURCE may use or disclose personal information. NET2SOURCE collects for "business purposes" or "commercial purposes" (as defined under the CCPA), which may include the following examples:

- To operate the organization's Service and provide with Service.
- To provide with support and to respond to inquiries, including to investigate and address concerns and monitor and improve the organization's Service.
- To provide/receive CVs of California residents having and containing personal information for meeting job purpose.
- To fulfill or meet the reason the information is provided. For example, contact information is shared to ask a question about Service, organization uses that personal information to respond to the inquiry. If personal information is provided to render Service, that information is used to process the payment and render Service.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described when collecting the personal information or as otherwise set forth in the CCPA.
- For internal administrative and auditing purposes.
- To detect security incidents and protect against malicious, deceptive, fraudulent or illegal activity, including, when necessary, to prosecute those responsible for such activities.

The examples provided above are illustrative and not intended to be exhaustive.

### **Disclosure of Personal Information for Business Purposes or Commercial Purposes**

NET2SOURCE may use or disclose and may have used or disclosed in the last twelve (12) months few of the categories of personal information for business or commercial purposes:



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The categories disclosed by the organization are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact disclosed by the organization but reflects the good faith belief to the best of knowledge that some of that information from the applicable category may be and may have been disclosed.

When the organization discloses personal information for a business purpose or a commercial purpose, the organization enters into 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.

### **Sale of Personal Information**

As defined in the CCPA, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for valuable consideration. This means that our organization may have received some kind of benefit in return for sharing personal information, but not necessarily a monetary benefit.

Please note that the categories listed below are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact sold, but reflects our organization's good faith belief to the best of NET2SOURCE's knowledge that some of that information from the applicable category may be and may have been shared for value in return.

NET2SOURCE may sell and may have sold in the last twelve (12) months the following categories of personal information:

- Category : \_\_\_\_\_
- Category : \_\_\_\_\_
- Category : \_\_\_\_\_
- Category : \_\_\_\_\_

### **Share of Personal Information**

NET2SOURCE may share personal information identified in the above categories with the following categories of third parties:

- Service Providers



- Payment processors
- NET2SOURCE affiliates
- NET2SOURCE's business partners
- Third party vendors to whom the discloser or the agents authorize the organization to disclose the personal information in connection services that the organization provides

## Rights under the CCPA

The CCPA provides California residents with specific rights regarding their personal information. If the area resident is of California, the following rights are available to the California resident:

- **The right to notice.** NET2SOURCE shall notify which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.
- **The right to request.** Under CCPA, the California residents have the right to request our organization. NET2SOURCE shall have to disclose information to the requestor about the organization's collection, use, sale, disclosure for business purposes and share of personal information. Once the organization receives and confirms the request, NET2SOURCE shall disclose:
  - The categories of personal information the organization collected about the requestor
  - The categories of sources for the personal information the organization collected about the requestor
  - The business or commercial purpose for collecting or selling that personal information
  - The categories of third parties with whom our organization shares that personal information
  - The specific pieces of personal information our organization collected
  - If our organization sold the requestor's personal information or disclosed the personal information for a business purpose,
  - NET2SOURCE shall disclose:
    - The categories of personal information categories sold
    - The categories of personal information categories disclosed
- **The right to say no to the sale of Personal Data (opt-out).** NET2SOURCE shall not sell the personal information if the same has been directed to our organization specifically. Our organization shall consider the opt-out request once the same has been informed to to us via contacting us.
- **The right to delete Personal Data.** Once the request has been made to delete the Personal Data (subject to certain exceptions) and the organization confirms the request, NET2SOURCE shall delete (and direct the organization's Service Providers to delete) the personal information from the organization's records, unless an exception applies. NET2SOURCE may deny any deletion request if retaining the information is necessary for our

organization or for organization's Service Providers to:

- o Complete the transaction for which the organization collected the personal information, provide a good or service requested, take actions reasonably anticipated within the context of the organization's ongoing business relationship with the requestor, or otherwise perform the agreed contract with the requestor.
  - o Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
  - o Debug products to identify and repair errors that impair existing intended functionality.
  - o Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
  - o Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546et. seq.).
  - o 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 requestor previously provided informed consent.
  - o Enable solely internal uses that are reasonably aligned with consumer expectations based the relationship
  - o Comply with a legal obligation.
  - o Make other internal and lawful uses of that information that are compatible with the contextin which has been provided already.
- **The right not to be discriminated against. NET2SOURCE shall not discriminate against for exercising any of Consumer's rights, including by:**
    - o Denying goods or services
    - o Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
    - o Providing a different level or quality of goods or services
    - o Suggesting a different price or rate for goods or services or a different level or quality of goods or services will be provided

## **Exercising CCPA Data Protection Rights**

In order to exercise the rights under the CCPA, and if he/she is a California resident, they can contact Us at:

By visiting this page on our website: <https://www.net2source.com/>



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By sending us an email:

NET2SOURCE shall entertain only the resident himself/herself, or a person registered with the California Secretary of State that the resident shall authorize to act on their behalf, may make a verifiable request related to the resident's personal information.

The request must:

- Provide sufficient information. NET2SOURCE shall then reasonably verify that the requestor is the person about whom our organization collected personal information or an authorized representative
- Be in a described form with sufficient detail .NET2SOURCE shall then properly understand, evaluate and respond to the request.

Our organization will not be able to respond a request or provide with the required information, if our organization cannot:

- Verify the identity or authority to make the request
- And confirm that the personal information relates to the person requesting
- NET2SOURCE shall disclose and deliver the required information free of charge within 45 days of receiving the verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

Any disclosures our organization shall provide will only cover the 12-month period preceding the verifiable request's receipt.

For data portability requests, NET2SOURCE will select a format to provide the personal information that is readily usable and should allow the California resident to transmit the information from one entity to another entity without hindrance.

## **Do Not Sell Personal Information**

Once NET2SOURCE receives and confirm a verifiable consumer request, our organization will stop selling personal information of the requestor. To exercise right to opt-out, the consumer can contact our organization.

## **Children's Privacy**



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NET2SOURCE does not address anyone under the age of 13. Our organization do not knowingly collect personally identifiable information from anyone under the age of 13. If our organization becomes aware that our organization have collected Personal Data from anyone under the age of 13 without verification of parental consent, our organization takes steps to remove that information from our organization servers.

If NET2SOURCE needs to rely on consent as a legal basis for processing information and the country requires consent from a parent, our organization may require the children's parent's consent before our organization collect and use that information.

### **Links to Other Websites**

Our organization's Service may contain links to other websites that are not operated by NET2SOURCE. If someone click on a third party link, they will be directed to that third party's site.

NET2SOURCE shall take no responsibility and shall have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

### **Changes to this Privacy Policy**

NET2SOURCE may update the Privacy Policy from time to time.

Our organization will provide such information via email and/or a prominent notice on our organization's Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.