

ZIV MEDIA GROUP, LLC

CCPA NOTICE FOR CALIFORNIA RESIDENTS

Effective Date: [INSERT DATE] Last Updated: [INSERT DATE]

Ziv Media Group, LLC ("Ziv Media," "Ziv," "we," "us," or "our") provides lead-generation, data, marketing, and related services. This CCPA Notice for California Residents ("CCPA Notice") explains how Ziv Media handles Personal Information relating to California residents and describes the privacy rights available to California consumers under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, the "CCPA").

This CCPA Notice applies only to the extent the CCPA applies to Ziv Media and to Personal Information subject to the CCPA. This CCPA Notice is intended to supplement, and where applicable operate together with, Ziv Media's other privacy notices, website terms, data disclosures, lead-form disclosures, consent notices, and contractual agreements. Nothing in this CCPA Notice is intended to expand Ziv Media's legal obligations beyond those imposed by applicable law.

1. SCOPE This CCPA Notice applies to California residents whose Personal Information is subject to the CCPA. The CCPA generally protects California residents acting in an individual or household capacity and may apply to certain other California-resident contexts depending upon the circumstances and applicable statutory provisions. Certain information and activities are excluded or exempt from the CCPA. Accordingly, not every item of information maintained by Ziv Media necessarily constitutes "Personal Information" under the CCPA, and not every individual or transaction necessarily receives every right described in this Notice.

2. DEFINITIONS

- **"CCPA"** Means the California Consumer Privacy Act, as amended, including applicable amendments, regulations, and implementing provisions.
- **"Consumer"** Means a California resident to whom the CCPA applies.
- **"Personal Information"** Generally means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, as defined by applicable law.
- **"Sensitive Personal Information"** Means information classified as sensitive personal information under the CCPA.

- **"Sale"** Means a transaction that constitutes a "sale" of Personal Information under the CCPA. The fact that Ziv Media commercially provides a service, lead, data product, or other information does not, by itself, determine whether a particular transaction constitutes a sale under the CCPA.
- **"Sharing"** Means the disclosure of Personal Information for cross-context behavioral advertising where such disclosure constitutes "sharing" under the CCPA.

3. DATA COLLECTION AND DISCLOSURE MATRIX Depending upon the nature of the relationship and the services involved, Ziv Media may collect, receive, or otherwise process categories of Personal Information. The specific categories of Personal Information collected depend upon the particular source, service, transaction, website interaction, lead-generation activity, or business relationship involved. Ziv Media does not intend this Notice to state that it collects a category of Personal Information that it does not actually collect or process.

Category of Personal Information	Sources of Collection	Business & Commercial Purposes	Categories of Third-Party Recipients
Identifiers (e.g., name, email address, telephone number, postal address, online identifier)	Directly from consumers, business clients, data providers, publicly available sources, websites, lead-generation partners	Providing services, generating/routing leads, communicating with customers/prospect s, marketing, validating data	Customers, business clients, service providers, contractors, data providers, marketing providers
Professional/Employment Information (e.g., employer, job title, business contact information)	Business clients, individuals communicating with Ziv Media, data providers, public sources	Maintaining business relationships, evaluating business transactions, analytics, marketing	Customers, business clients, service providers, professional advisors

Commercial Information	Customers, vendors, data providers	Billing, payment, collections, accounting, maintaining business records	Service providers, contractors, professional advisors
Internet or Electronic Network Activity (e.g., interactions with websites/digital services)	Websites, digital properties, marketing/advertising activities, system interactions	Operating/improving websites, providing marketing/advertising services, preventing fraud/security incidents	Technology providers, analytics providers, marketing service providers
Inferences Derived from Data	Data providers, analytics, internal tracking	Analytics, validating or improving data, quality control	Analytics providers, marketing service providers
Information Provided via Forms/Inquiries	Directly from consumers, communications, customer interactions	Responding to requests/inquiries, protecting legal rights, complying with legal requirements	Service providers, governmental authorities (when required)

4. LEAD-GENERATION, SALE, AND SHARING OF PERSONAL INFORMATION Ziv Media operates in the lead-generation and data-marketing ecosystem. Depending upon the particular service and transaction, Ziv Media may acquire, generate, validate, enrich, process, license, distribute, or otherwise provide leads or data to business customers. The CCPA classification of a particular activity depends upon the underlying facts and applicable law. For example, a transaction involving the commercial provision of a lead or data record may constitute a sale, a disclosure for a business purpose, service-provider or contractor processing, or another legally distinct transaction depending upon the circumstances.

Accordingly, Ziv Media does not characterize every commercial transfer of information as a "sale" merely because consideration is involved, nor does Ziv Media characterize every transfer

as outside the CCPA's definition of sale. Where applicable, Ziv Media will honor rights and obligations imposed by the CCPA based upon the legally applicable classification of the relevant processing activity.

- **Sale of Personal Information:** [SELECT ONE: Ziv Media has sold the following categories of Personal Information in the preceding 12 months: [INSERT CATEGORIES] to [INSERT CATEGORY OF THIRD PARTIES] for [INSERT PURPOSE] **OR** Ziv Media has not sold Personal Information during the preceding 12 months.]
- **Sharing for Cross-Context Behavioral Advertising:** [SELECT ONE: Ziv Media shares Personal Information for cross-context behavioral advertising. Categories shared include [INSERT] to [INSERT RECIPIENTS]. **OR** Ziv Media has not shared Personal Information for cross-context behavioral advertising during the preceding 12 months.]

5. SENSITIVE PERSONAL INFORMATION Ziv Media may process Sensitive Personal Information only where applicable to its actual business activities and subject to applicable law. Where required by law, Ziv Media will provide consumers with the right to limit the use and disclosure of Sensitive Personal Information. Ziv Media does not intend this Notice to represent that it collects Sensitive Personal Information merely because a particular category is recognized under the CCPA.

- **Inferences:** Ziv Media [DOES / DOES NOT] use or disclose Sensitive Personal Information for the purpose of inferring characteristics about a consumer.

6. MINORS Ziv Media will comply with applicable CCPA requirements concerning the Personal Information of minors. Where the CCPA imposes heightened requirements concerning consumers under applicable age thresholds, Ziv Media will apply those requirements based upon its actual knowledge and applicable legal obligations. Ziv Media [HAS / DOES NOT HAVE] actual knowledge that it sells or shares the Personal Information of consumers under 16 years of age.

7. NOTICE OF FINANCIAL INCENTIVE

[SELECT ONE: Ziv Media does not offer financial incentives or price/service differences in exchange for the retention, sale, or sharing of Personal Information. **OR** Ziv Media offers the following financial incentives: [INSERT MATERIAL TERMS]. We calculate the value of the consumer's data by [INSERT VALUATION METHOD]. Consumers may opt-in by [INSERT METHOD] and may withdraw at any time by [INSERT WITHDRAWAL METHOD].]

8. CALIFORNIA PRIVACY RIGHTS Subject to the CCPA and applicable exceptions, California consumers may have the following rights.

- **A. Right to Know and Access:** You may have the right to request information concerning the categories of Personal Information collected; the categories of sources from which it is collected; the purposes for collecting, selling, or sharing; the categories of third parties to whom it is disclosed; the categories sold or shared; and specific pieces of Personal Information, subject to applicable legal requirements and exceptions.

- **B. Right to Delete:** You may have the right to request deletion of Personal Information that Ziv Media has collected about you, subject to statutory exceptions. Ziv Media may retain information when retention is permitted or required by law, including where necessary for certain transactions, security, legal obligations, internal purposes permitted by law, or the establishment, exercise, or defense of legal claims.
- **C. Right to Correct:** You may have the right to request correction of inaccurate Personal Information maintained by Ziv Media, subject to applicable law.
- **D. Right to Opt Out of Sale:** If Ziv Media sells Personal Information as defined by the CCPA, California consumers may have the right to opt out of that sale. [INSERT "DO NOT SELL OR SHARE MY PERSONAL INFORMATION" LINK HERE].
- **E. Right to Opt Out of Sharing:** If Ziv Media shares Personal Information for cross-context behavioral advertising as defined by the CCPA, California consumers may have the right to opt out of that sharing. [INSERT LINK IF APPLICABLE].
- **F. Right to Limit Use and Disclosure of Sensitive Personal Information:** Where applicable, California consumers may have the right to limit certain uses and disclosures of Sensitive Personal Information beyond purposes permitted without limitation under the CCPA. [INSERT "LIMIT THE USE OF MY SENSITIVE PERSONAL INFORMATION" LINK IF APPLICABLE].
- **G. Right to Data Portability:** Where applicable, consumers may request Personal Information in a portable format as provided by the CCPA.
- **H. Right to Non-Discrimination:** Ziv Media will not discriminate against a consumer for exercising rights provided by the CCPA in a manner prohibited by applicable law.
- **I. Right to Appeal:** Where applicable, consumers may appeal Ziv Media's denial of a privacy request. Ziv Media will process appeals in accordance with applicable CCPA requirements. [INSERT APPEAL MECHANISM].

9. GLOBAL PRIVACY CONTROL AND OPT-OUT PREFERENCE SIGNALS If Ziv Media is subject to CCPA requirements governing the sale or sharing of Personal Information, it will honor applicable opt-out preference signals as required by law. Where applicable, Ziv Media will process a valid Global Privacy Control (GPC) signal as a request to opt out of sale and/or sharing to the extent required by the CCPA. Ziv Media processes these signals in a frictionless manner. The technical implementation of opt-out preference signals is subject to Ziv Media's website architecture and applicable legal requirements.

10. HOW TO SUBMIT A CCPA REQUEST California consumers may submit eligible privacy requests through the methods designated by Ziv Media.

- **Toll-Free Telephone:** [INSERT TOLL-FREE NUMBER]
- **Privacy Request Email:** [INSERT EMAIL ADDRESS]
- **Online Privacy Request Form:** [INSERT LINK TO WEB FORM]

Ziv Media may request information reasonably necessary to verify the identity and authority of the person making a request. Consumers should provide sufficient information to allow Ziv Media to reasonably identify the applicable records while avoiding unnecessary submission of additional sensitive information.

11. VERIFICATION AND AUTHORIZED AGENTS Where permitted by the CCPA, a California consumer may use an authorized agent to submit a request on the consumer's behalf. Ziv Media may require evidence establishing the agent's authority and may independently verify the consumer's identity as permitted or required by applicable law.

Ziv Media may take reasonable steps to verify the identity of a consumer submitting a request. The verification process will be proportionate to the nature and sensitivity of the request and the potential risk associated with unauthorized disclosure or deletion of Personal Information. Ziv Media will not request unnecessary Personal Information solely for purposes of verifying a consumer's identity.

12. RESPONSE PERIODS AND EXCEPTIONS Ziv Media will respond to verified consumer requests within the time periods required by applicable law. Where the CCPA permits an extension, Ziv Media may extend the response period as permitted by law and will provide any required notice concerning the extension. Requests to opt out of sale or sharing and requests concerning limitations on Sensitive Personal Information will be handled within applicable statutory and regulatory timeframes.

CCPA rights are subject to statutory and regulatory exceptions. Ziv Media may deny or limit a request where permitted or required by law, including circumstances involving: inability to verify the consumer; legal obligations; security; fraud prevention; legal claims; contractual rights; internal uses permitted by law; transactions or services that require retention; information exempt from the CCPA; publicly available information; information governed by other applicable privacy laws or exemptions; or other statutory exceptions. A denial will be explained to the extent required by applicable law.

13. DATA SECURITY Ziv Media maintains administrative, technical, and physical safeguards designed to protect Personal Information against unauthorized access, disclosure, alteration, misuse, or destruction. No method of transmission, storage, or processing can be guaranteed to be completely secure. Ziv Media does not represent that its security measures eliminate all possible security risks.

14. DATA RETENTION Ziv Media retains Personal Information only for as long as reasonably necessary for applicable business, legal, regulatory, contractual, security, dispute-resolution, operational, and other legitimate purposes, subject to applicable law.

- **Identifiers & Contact Data:** Retained for [INSERT TIMEFRAME OR CRITERIA].
- **Commercial Information:** Retained for [INSERT TIMEFRAME OR CRITERIA].
- **Internet/Network Activity:** Retained for [INSERT TIMEFRAME OR CRITERIA].

Retention periods may vary depending upon: the type of information; the purpose for which it is maintained; the nature of the relationship; contractual requirements; legal obligations; regulatory requirements; security considerations; and whether the information is required to establish, exercise, or defend legal rights. Ziv Media does not represent that all Personal Information can

be immediately or permanently deleted from every system when a consumer makes a request where applicable law permits or requires continued retention.

15. DATA BROKER STATUS & DELETE ACT (DROP) Ziv Media's status under California's data-broker laws depends upon its actual collection, sale, and relationship practices. If Ziv Media qualifies as a data broker under applicable California law, Ziv Media will comply with applicable data-broker registration, disclosure, deletion, reporting, and other legal requirements. Where applicable, Ziv Media will also comply with requirements relating to California's Delete Request and Opt-Out Platform ("DROP") as administered by the California Privacy Protection Agency.

16. NOTICE AT COLLECTION Where required by the CCPA, Ziv Media will provide consumers with a Notice at Collection at or before the point at which Personal Information is collected. A Notice at Collection may be provided separately from this CCPA Notice where appropriate. The Notice at Collection may vary depending upon the collection context, including website forms, lead-generation forms, marketing interactions, or other collection mechanisms.

17. THIRD-PARTY WEBSITES AND BUSINESS TRANSACTIONS Ziv Media may provide links to third-party websites, platforms, or services. Third-party websites and services may maintain their own privacy notices and practices. Ziv Media is not responsible for the privacy practices of third parties to the extent those practices are outside Ziv Media's control.

Ziv Media may disclose Personal Information as reasonably necessary in connection with a merger, acquisition, financing, reorganization, sale of assets, bankruptcy proceeding, or other corporate transaction, subject to applicable law.

18. LEGAL DISCLOSURES AND LIMITATIONS Ziv Media may disclose Personal Information where reasonably necessary to: comply with applicable law; respond to lawful governmental requests; comply with legal process; protect rights, property, or safety; detect or prevent fraud or unlawful activity; enforce applicable agreements; or establish, exercise, or defend legal claims.

This CCPA Notice is intended to describe Ziv Media's California privacy practices and rights under the CCPA based upon the company's actual practices and applicable law. Nothing in this Notice is intended to: create a warranty; guarantee security; guarantee data accuracy; create rights beyond applicable law; waive statutory exceptions; override applicable law; replace a legally required Notice at Collection; replace TCPA consent language; replace contractual data-processing terms; replace a data-license agreement; replace Terms & Conditions; or create obligations inconsistent with applicable law. Where a specific legal requirement applies to a particular transaction, data flow, consumer, or jurisdiction, Ziv Media will apply the applicable requirement.

19. CHANGES TO THIS CCPA NOTICE Ziv Media may update this CCPA Notice from time to time to reflect changes in: applicable law; regulatory requirements; business operations; data practices; technology; consumer rights; or compliance procedures. The updated version will be posted on the applicable Ziv Media website with its effective or updated date.

20. CONTACT INFORMATION Ziv Media Group, LLC [INSERT BUSINESS ADDRESS] Privacy
Contact: [INSERT CONTACT NAME/TITLE] Email: [INSERT EMAIL ADDRESS] Website:
[INSERT WEBSITE URL]