

ZIV MEDIA GROUP, LLC

CCPA NOTICE FOR CALIFORNIA RESIDENTS

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

Ziv Media Group, LLC ("Ziv Media," "we," "us," or "our") provides lead-generation, data, and marketing services. This notice explains what Personal Information we collect about California residents, how we use and disclose it, and the rights you have under the California Consumer Privacy Act, as amended by the California Privacy Rights Act, and its regulations (the "CCPA"). It supplements our Privacy Policy and applies to Personal Information subject to the CCPA, including information about individuals in their business or professional capacity. Capitalized terms not defined here have the meanings given in the CCPA.

1. PERSONAL INFORMATION WE COLLECT, USE, AND DISCLOSE

The table below describes the categories of Personal Information we have collected in the preceding 12 months, where it came from, why we use it, who receives it, and whether we have sold it. We do not collect categories of Personal Information that are not listed.

Category of Personal Information	Sources	Business or commercial purposes	Categories of recipients	Sold in last 12 months?
Identifiers	Consumers; business clients; data providers; public sources; websites; lead-generation partners	Providing services; generating, validating, enriching and routing leads; communicating with customers and prospects; marketing; fraud prevention	Customers and business clients; service providers and contractors; data providers; marketing service providers	Yes
Customer records and contact information (Cal. Civ. Code § 1798.80(e))	Consumers; business clients; lead forms	Same as Identifiers; billing and record-keeping	Customers and business clients; service providers	Yes
Professional or employment-related information	Business clients; data providers; public sources; individuals who contact us	Lead generation and enrichment; B2B marketing; maintaining business relationships; analytics	Customers and business clients; service providers; professional advisors	Yes
Commercial information	Customers; vendors; data providers	Billing, payment, collections, accounting; maintaining business records	Service providers; contractors; professional advisors	No
Internet or other electronic network activity	Our websites and digital properties; lead forms; advertising activity	Operating and improving websites; security and fraud prevention; analytics; providing marketing services	Technology and analytics providers; service providers	No
Geolocation data (approximate, e.g., derived from IP address)	Websites; lead forms	Fraud prevention; lead validation; analytics	Technology and analytics providers; service providers	No
Audio information (call recordings, for pay-per-call services)	Telephone calls routed through our systems	Call routing and billing verification; quality control; dispute resolution	Customers and business clients; service providers	[CONFIRM]
Inferences drawn from the above	Data providers; our own analytics	Lead scoring and quality control; improving data	Customers and business clients; analytics and service providers	[CONFIRM]

Other business purposes. We also use Personal Information to comply with legal obligations, protect our rights and the security of our systems, respond to your requests, and evaluate or complete a merger, financing, or sale of assets. We use Personal Information only for purposes that are reasonably necessary and proportionate to the purposes for which it was collected and that are disclosed in this notice.

2. SALE AND SHARING OF PERSONAL INFORMATION

Sale. Ziv Media provides leads, call transfers, and data records to business customers in exchange for payment. Because these disclosures are made for monetary or other valuable consideration, we treat them as "sales" of Personal Information under the CCPA. In the preceding 12 months, we sold the categories marked "Yes" in the table above to the following categories of third parties: business customers and clients (including advertisers, lead buyers, and marketers) and data providers, for the purpose of lead generation, marketing, and related data services.

Sharing. We have not "shared" Personal Information for cross-context behavioral advertising in the preceding 12 months, and we do not sell or share the Personal Information of consumers we know to be under 16 years of age.

Your right to opt out. You may opt out of the sale of your Personal Information at any time by using the "Do Not Sell or Share My Personal Information" link on our website, by submitting a request as described in Section 7, or by enabling a Global Privacy Control signal (see Section 6).

3. SENSITIVE PERSONAL INFORMATION

We do not collect Sensitive Personal Information for the purpose of inferring characteristics about consumers, and we do not use or disclose it for purposes other than those permitted without a right to limit under CCPA regulations. Because of this, we do not offer a "Limit the Use of My Sensitive Personal Information" link. If this changes, we will update this notice and provide that right.

4. YOUR CALIFORNIA PRIVACY RIGHTS

Subject to verification and the CCPA's exceptions, California residents have the following rights:

- **Right to Know and Access.** Request the categories and specific pieces of Personal Information we have collected about you, the categories of sources, our purposes for collecting, selling, or sharing it, and the categories of third parties to whom we disclosed or sold it. You may request your information in a portable, readily usable format. You may make this request up to twice in a 12-month period.
- **Right to Delete.** Request deletion of Personal Information we collected from you, subject to exceptions (for example, completing transactions, security, legal compliance, and establishing or defending legal claims). Where we delete information, we will also direct our service providers and contractors to do so and notify third parties to whom we sold it, unless that is impossible or involves disproportionate effort.
- **Right to Correct.** Request correction of inaccurate Personal Information we maintain about you.
- **Right to Opt Out of Sale or Sharing.** Direct us not to sell or share your Personal Information. We will wait at least 12 months before asking you to reauthorize a sale after you opt out.
- **Right to Non-Discrimination.** We will not deny you goods or services, charge different prices, or provide a different level of quality because you exercised your rights. We do not offer financial incentives or price or service differences in exchange for your Personal Information.

Additionally, under California Civil Code § 1798.83, California residents may request information about disclosures of certain Personal Information to third parties for their direct marketing purposes. You may make this request using the methods in Section 7.

5. RETENTION

We keep Personal Information only as long as reasonably necessary for the purposes described in this notice, and for no longer than the following periods unless a longer period is required by law, a legal hold, or the defense of legal claims:

- **Identifiers, customer records, professional information, geolocation, inferences, and lead records:** [4 years] from collection or last interaction.
- **Commercial information (billing and accounting records):** [7 years] from the transaction.
- **Internet and electronic network activity:** [13 months] from collection.
- **Call recordings (audio information):** [24 months] from the call.

When these periods end, we delete or de-identify the information.

6. GLOBAL PRIVACY CONTROL AND OPT-OUT PREFERENCE SIGNALS

We honor opt-out preference signals, including Global Privacy Control (GPC), as a valid request to opt out of the sale and sharing of Personal Information for the browser or device that sends the signal, and, where we can associate it with you (for example, because you are logged in), for your account or related Personal Information. We process these signals without requiring you to provide additional information.

7. HOW TO SUBMIT A REQUEST

Because we operate exclusively online and interact with consumers online, we offer the following methods for submitting requests to know, delete, correct, or opt out:

- **Email:** [INSERT PRIVACY EMAIL]
- **Online form:** [INSERT WEB FORM URL]

Verification. We must verify that the person making a request to know, delete, or correct is the consumer about whom we hold information. We will ask you to confirm information that matches records we already hold, and we will not ask for more than is necessary. Opt-out requests do not require verification. **Authorized agents.** You may use an authorized agent to submit a request for you. We may require proof of the agent's authority and may ask you to verify your identity directly with us. **Response times.** We will confirm receipt of a request within 10 business days and respond within 45 calendar days. If we need more time, we may extend by up to another 45 days and will tell you why. We process opt-out requests as soon as feasibly possible and no later than 15 business days. **Denials.** If we deny a request, in whole or in part, we will explain the reason, subject to legal limits.

8. DATA BROKER STATUS AND THE DELETE ACT

Ziv Media sells Personal Information about consumers with whom it does not have a direct relationship and is therefore registered as a data broker with the California Privacy Protection Agency ("CPPA") [REGISTRATION CONFIRMATION]. Our registration is available on the CPPA's public data broker registry. Consistent with the California Delete Act, we access the CPPA's Delete Request and Opt-Out Platform ("DROP") and process deletion requests submitted through it at least once every 45 days. You may also submit a deletion request directly to us as described in Section 7.

9. MINORS

Our services are directed to adults and businesses, not to children. We do not knowingly collect Personal Information from consumers under 16 years of age and do not sell or share the Personal Information of consumers we know to be under 16. If you believe a minor has provided us Personal Information, contact us and we will delete it.

10. NOTICE AT COLLECTION

We provide a Notice at Collection at or before the point where we collect Personal Information, including on our website and lead forms. That notice links to this CCPA Notice and our Privacy Policy. This notice does not replace consent language that applies to a specific collection, such as TCPA consent disclosures.

11. SECURITY

We maintain reasonable administrative, technical, and physical safeguards designed to protect Personal Information. No system is completely secure, and we cannot guarantee that our safeguards will prevent every unauthorized access or disclosure.

12. THIRD-PARTY LINKS, LEGAL DISCLOSURES, AND BUSINESS TRANSFERS

Our websites may link to third-party sites with their own privacy practices, for which we are not responsible. We may disclose Personal Information to comply with law or legal process, respond to lawful government requests, prevent fraud or security incidents, enforce our agreements, and establish, exercise, or defend legal claims. If we are involved in a merger, acquisition, financing, reorganization, or sale of assets, Personal Information may be transferred as part of that transaction, subject to applicable law.

13. CHANGES TO THIS NOTICE

We review and update this notice at least once every 12 months and whenever our practices change. The updated version will be posted on our website with a new "Last Updated" date.

14. CONTACT US

Ziv Media Group, LLC

[INSERT BUSINESS ADDRESS]

Privacy contact: [INSERT NAME/TITLE] | Email: [INSERT EMAIL] | Website: [INSERT URL]