

# California Resident Supplemental Privacy Policy



**Effective: 1/1/2020**

This Privacy Notice for California Residents supplements and is expressly made part of the information contained in the Cantella & Co., Inc. Privacy Policy and applies solely to all visitors, clients, representatives, and others who reside in the State of California. We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (CCPA). Any terms defined in the CCPA have the same meaning when used in this Notice.

## Information We Collect

Cantella & Co., Inc. 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 (“personal information”). Dependent on your relationship with Cantella & Co., Inc, we may have collected the following categories of personal information from you within the last twelve (12) months.

Category	Example of Information	Collected?
Identifiers	Name, legal address, mailing address, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	Yes
Internet or Electronic Network Activity Information	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	Yes
Geolocation	Physical location or movements.	No
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
Biometric Information	Genetic, biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints.	Yes



Category	Example of Information	Collected?
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>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.</p> <p>Some Personal Information included in this category may overlap with other categories.</p>	Yes
Professional or Employment Information	Current or past job history or performance evaluations.	Yes
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	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.	No
Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information	Yes
Inferences drawn from other personal information	Profiles reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

Personal information does not include:

1. Publicly available information from government records.
2. Deidentified or aggregated consumer information.
3. Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.



Cantella & Co., Inc. obtains the categories of personal information listed above from the following categories of sources:

1. Directly from you. For example, from forms you complete or products and services you purchase.
2. Indirectly from you. For example, from observing your actions on our website.

### **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following business purposes:

1. To fulfill or meet the reason you provided the information. For example, to open an account, execute an advisory agreement, or send you information that was requested of us.
2. To create, maintain, customize, and secure your account with us.
3. To process your requests, purchases, transactions, and payments and prevent transactional fraud.
4. To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
5. To help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business.
6. For testing, research, analysis, and product development, including to develop and improve our website, products, and services.
7. To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
8. As described to you when collecting your personal information or as otherwise set forth in the CCPA, or other Federal and State regulations.

Cantella & Co., Inc. will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **Sharing Personal Information**

Cantella & Co., Inc. may disclose your personal information to a third party for business purposes only. When we disclose personal information for a business purpose, we enter 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.

We share your personal information with the following categories of third parties:

1. Contractors and service providers
2. Third Parties with whom we partner with to provide you products and services
3. Data Aggregators



## **Sale of Personal Information**

In the preceding 12 months, Cantella & Co., Inc. has not sold personal information.

## **Your Rights and Choices**

The CCPA provides individuals (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

## **Access to Specific Information and Data Portability Rights**

You have the right to request that Cantella & Co., Inc. disclose certain information to you about our collection and use of your personal information over the past 12 months. As a reminder, Cantella & Co., Inc. does not sell your data. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

1. The categories of personal information we collected about you.
2. The categories of sources for the personal information we collected about you.
3. Our business or commercial purpose for collecting that personal information.
4. The categories of third parties with whom we share that personal information.
5. The specific pieces of personal information we collected about you (also called a data portability request).
6. If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - a. Sales, identifying the personal information categories that each category of recipient purchased; and
  - b. Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

## **Deletion Request Rights**

You have the right to request that Cantella & Co., Inc. delete any of your personal information that we collected from you and retained, subject to certain exceptions. After we have received and confirmed your verifiable consumer request; we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.



2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. 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 you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Exercising Access, Data Portability, and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

1. Calling us at +1 800-333-3502, or
2. Sending a notification email to [Compliance@cantella.com](mailto:Compliance@cantella.com), which will prompt an outgoing call to the information we have on file for you.

Only you or a person registered with the California Secretary of State that you authorize 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.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

1. Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Our employees are poised to ask you security questions to verify your identity.
2. Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.



### **Personal Information Sales Opt-out and Opt-In Rights**

We currently do not sell personal information, but should we choose to in the future minors have additional options. If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the “right to opt-out”). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the “right to opt-in”) from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer who is between 13 and 16 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

### **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days) we will inform you of the reason and extension period in either verbally or in writing.

If you have an account with us, we will deliver our written response to that account’s contact information. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request’s receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

1. Deny you goods or services.
2. Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
3. Provide you a different level or quality of goods or services.
4. 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 Websites that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not disclose personal information to third parties outside the requirements that we have to provide our services to you. For further questions please contact [Compliance@cantella.com](mailto:Compliance@cantella.com).

### **Changes to Our Privacy Notice**

Cantella & Co., Inc. reserves 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 our website and update the notice's effective date. Your continued use of our services and website following the posting of changes constitutes your acceptance of such changes, these changes will also be mailed to individuals whom have an account with Cantella & Co., Inc.

### **Contact Information**

If you have any questions or comments about this notice, the ways in which Cantella & Co., Inc. collects and uses your information described above, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Address:

Cantella & Co., Inc.  
350 Main Street, 3<sup>rd</sup> Floor  
Malden, MA 02148

Phone: 800-333-3502

Email: [Compliance@cantella.com](mailto:Compliance@cantella.com)