

# Supplemental California Consumer Privacy Act Disclosures

In these Supplemental California Consumer Privacy Act Disclosures ("CCPA Disclosures"), we, Armanino LLP, disclosure information about our data processing practices as required by the California Consumer Privacy Act of 2018 ("CCPA") and supplementing the disclosures in our Privacy Policy at <https://www.armaninollp.com/privacy-policy/> and any CCPA Notice at Collection issued in addition to the CCPA Notice at Collection Online and CCPA Notice at Collection California Customers provided in Sections III and IV below. These CCPA Disclosures are effective January 1, 2020. You can download a PDF version here: <https://www.armaninollp.com/ccpadisclosures>.

## I. Who and what information is subject to these CCPA Disclosures?

California residents are protected as "consumers" by the California Consumer Privacy Act of 2018 ("CCPA") with respect to personal information.

A number of statutory exceptions apply under the CCPA and to these CCPA Disclosures, including the following:

- (1) personal information reflecting a written or verbal communication or a transaction between the business and the consumer, where the consumer is a natural person who is acting as an employee, owner, director, officer, or contractor of a company, partnership, sole proprietorship, non-profit, or government agency and whose communications or transaction with the business occur solely within the context of the business conducting due diligence regarding, or providing or receiving a product or service to or from such company, partnership, sole proprietorship, non-profit, or government agency
- (2) personal information that is collected by a business about a natural person in the course of the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the natural person's personal information is collected and used by the business solely within the context of the natural person's role or former role as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or a contractor of that business
- (3) personal information that is collected by a business that is emergency contact information of the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the personal information is collected and used solely within the context of having an emergency contact on file
- (4) personal information that is necessary for the business to retain to administer benefits for another natural person relating to the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the personal information is collected and used solely within the context of administering those benefits.

## II. How can a consumer with a disability access these CCPA Disclosures?

Consumers who have a visual disability may be able to use a screen reader or other text-to-speech or text-to-Braille tool to review the contents of this notice.

### **III. CCPA Notice at Collection Online**

In this CCPA Notice at Collection Online, we are addressing disclosure requirements under California Civil Code §1798.100(b) and California Attorney General Regulations § 999.305 at or before the point of online collection.

We collect the following categories of personal information about consumers and for the following business or commercial purposes:

If you submit any personal information applying for a job or internship, such personal information will be used, processed, transferred, and stored by Armanino for the purposes of recruitment and evaluations of qualifications for possible employment or internship possibilities. If selected for a position or internship, such personal information may also be used for onboarding activities.

You may choose to provide us with certain personal information when you contact us to subscribe to Armanino newsletters, register for events, and request information about Armanino services. The types of information that you may provide during your visit to the website may include: name, title, company information, email address, telephone and fax number, and address. You will know which personal information you have provided because you will have provided it yourself. Armanino may collect, use, process, store, and transfer such data to make contacts with you by telephone, email, or ground mail, to provide you with information and advertisements about Armanino and our services, to establish and maintain a customer or prospective customer relationship, and to evaluate, develop, and improve our services.

On certain parts of the site, we may use cookies. “Cookies” are small text files stored in your browser that assist us in providing a more customized web experience. Cookies also allow us to understand site usage and improve the content and offerings on the site. We also may use cookies to offer you products or services.

The CCPA Privacy Policy, is available [below](#).

### **IV. CCPA Notice at Collection California Customers**

In this CCPA Notice at Collection California Customers, we are addressing disclosure requirements under California Civil Code §1798.100(b) and California Attorney General Regulations § 999.305 at or before the point of certain offline collection of customer information.

We collect the following categories of personal information about consumers and for the following business or commercial purposes:

Name, postal address, email address, account name, social security number, driver's license number, passport number, payment card information, financial information, records or personal property, services purchased, voice mail, and inferences drawn from any of these categories to create a profile on customers for the purposes of providing your accounting, tax, consulting and other professional services, as well as marketing communication.

The CCPA Privacy Policy, is available [below](#).

## V. CCPA Privacy Policy

Beyond the disclosures in the preceding "Notice At Collection" segment, we are providing additional disclosures about consumer rights and our personal information handling practices in the preceding twelve months, as required by the CCPA and regulations of the California Attorney General, including §999.308 (Privacy Policy).

### 1. Right to Know About Personal Information Collected, Disclosed, or Sold

This Supplemental CCPA Privacy Policy describes the personal information we generally collect, use, disclose and sell about California residents. You have the right to request that we disclose what personal information we collect, use, disclose and sell about you specifically ("right to know"). To submit a request to exercise the right to know call our toll-free phone number (844) 582-8883 or submit an email request to [legal@armaniinollp.com](mailto:legal@armaniinollp.com) and include "California Request to Know" in the subject line. Please specify in your request the details you would like to know, including any specific pieces of personal information you would like to access.

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. We will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

### 2. Our Personal Information Handling Practices in 2019

We have set out below categories of personal information we have collected about California residents in the preceding 12 months and, for each category of personal information listed, the categories of sources from which that information was collected, the business or commercial purposes for which the information was collected, and the categories of third parties with whom we shared the personal information.

<b>Category of personal information</b>	<b>We collected such personal information to use for the following business or commercial purposes:</b>	<b>We have collected such personal information from the following categories of sources:</b>	<b>We shared such personal information with the following categories of third parties:</b>
Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol	To provide accounting, tax, consulting and other professional services, as well as marketing	Directly from the California resident.	Cloud hosting and internet service providers, government entities, contractors and

<p>address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.</p>	<p>communication.</p>		<p>vendors, operating systems and platforms.</p>
<p>Any categories of personal information described in subdivision (e) of Section 1798.80: "Personal information" means 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. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records."</p>	<p>To provide accounting, tax, consulting and other professional services;</p> <p>For the purposes of recruitment and evaluations of qualifications for possible employment or internship possibilities;</p> <p>For employee onboarding;</p> <p>To make contacts with you by telephone, email, or ground mail, to provide you with information and advertisements about Armanino and our services, establish and maintain a well-managed customer or prospective customer relationship, and to evaluate, develop, and improve our services; and</p> <p>To provide a more customized web experience and to understand site usage and improve the content and offerings of the site.</p>	<p>Directly from the California resident.</p>	<p>Cloud hosting and internet service providers, government entities, contractors and vendors, operating systems and platforms.</p>
<p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or</p>	<p>To make contacts with you by telephone, email, or ground mail, to provide you with information and advertisements about</p>	<p>Directly from the California resident.</p>	<p>Cloud hosting and internet service providers, government entities, contractors and vendors, operating systems</p>

<p>consuming histories or tendencies.</p>	<p>Armanino and our services, establish and maintain a well-managed customer or prospective customer relationship, and to evaluate, develop, and improve our services.</p>		<p>and platforms.</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 Web site, application, or advertisement.</p>	<p>To make contacts with you by telephone, email, or ground mail, to provide you with information and advertisements about Armanino and our services, establish and maintain a well-managed customer or prospective customer relationship, and to evaluate, develop, and improve our services; and</p> <p>To provide a more customized web experience and to understand site usage and improve the content and offerings of the site.</p>	<p>Directly from the California resident.</p>	<p>Cloud hosting and internet service providers, government entities, contractors and vendors, operating systems and platforms.</p>
<p>Audio, electronic, visual, thermal, olfactory, or similar information.</p>	<p>To make contacts with you by telephone, email, or ground mail, to provide you with information and advertisements about Armanino and our services, establish and maintain a well-managed customer or prospective customer relationship, and to evaluate, develop, and improve our services.</p>	<p>Directly from the California resident.</p>	<p>Cloud hosting and internet service providers, government entities, contractors and vendors, operating systems and platforms.</p>

Professional or employment-related information.	For the purposes of recruitment and evaluations of qualifications for possible employment or internship possibilities; and For employee onboarding.	Directly from the California resident.	Cloud hosting and internet service providers, government entities, contractors and vendors, operating systems and platforms.
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).	For the purposes of recruitment and evaluations of qualifications for possible employment or internship possibilities; and For employee onboarding.	Directly from the California resident	Cloud hosting and internet service providers, government entities, contractors and vendors, operating systems and platforms
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.	To make contacts with you by telephone, email, or ground mail, to provide you with information and advertisements about Armanino and our services, establish and maintain a well-managed customer or prospective customer relationship, and to evaluate, develop, and improve our services.	Directly from the California resident	Cloud hosting and internet service providers, government entities, contractors and vendors, operating systems and platforms

### 3. Disclosures of Personal Information, No Sale

Over the preceding 12 months, we disclosed certain categories of California residents' personal information to the categories of third parties as shown in the table above.

We do not and will not sell California residents' personal information. We do not sell the personal information of minors under 16 years of age without affirmative authorization.

### 4. Right to Request Deletion of Personal Information

You have a right to request the deletion of personal information that we collect or maintain about you. To submit a request to delete personal information, please call at (844) 582-8883 or submit an email request to [legal@armaninollp.com](mailto:legal@armaninollp.com) and include “California Request to Delete” in the subject line. Please specify in your request the personal information about you that you would like to have deleted, which can be all of your personal information as required by the CCPA.

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. Once we have verified your identity, we will ask you to confirm that you wish to have your personal information deleted. Once confirmed, we will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

#### **5. Right to Opt-Out of the Sale of Personal Information**

You have the right to opt-out of the sale of your personal information by a business. We do not, and will not, sell your personal information.

#### **6. Right to Non-Discrimination for the Exercise of a Consumer’s Privacy Rights**

You may not be discriminated against because you exercise any of your rights under the CCPA in violation of Cal. Civ. Code §1798.125.

#### **7. Authorized Agent**

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 registered with the Secretary of State of California; and
- You sign a written declaration that you authorize the authorized agent to act on your behalf.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please have the authorized agent take the following steps in addition to the steps described in Sections 2 and 3 above:

- Mail a certified copy of your written declaration authorizing the authorized agent to act on your behalf to 12657 Alcosta Blvd, Suite 500, San Ramon, CA 94583; 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 4000 to 4465, 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.

## **8. Contact for More Information**

If you have questions or concerns regarding our privacy policy or practices, you may contact us using the following details:

Email address: [info@armaninollp.com](mailto:info@armaninollp.com)

Postal address: 12657 Alcosta Blvd, Suite 500, San Ramon, CA 94583

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