



PRIVACY POLICY FOR CALIFORNIA RESIDENTS

In these California Consumer Privacy Act Disclosures ("CCPA Disclosures"), TAIT and other members and affiliates of TAIT Group of Companies (including, but not limited to, Production Glue, Kinesys, Brilliant and ITEC, collectively "TAIT Group") disclose information about our data processing practices as required by the California Consumer Privacy Act of 2018 ("CCPA") and supplement the disclosures in our Privacy Policy. These CCPA Disclosures are addressed to California residents, are effective January 1, 2020, and were last updated January 31, 2022.

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

California residents are protected as "consumers" by the CCPA with respect to personal information. A number of statutory exceptions apply under the CCPA. As a result some of these CCPA Disclosures do not apply to 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. Accessibility

Consumers who need to access this Notice in an alternative format due to having a disability, please contact dataprivacy@taittowers.com

III. CCPA Notice at Collection

In this CCPA Notice at Collection, we explain the categories of personal information we collect from consumers who use our website located at www.taittowers.com and other TAIT Group websites that directly link to our Privacy Policy (collectively, our "Site") and consumers whose information we collect for outreach purposes, and the purposes for which we use such information.

Information You Actively Submit: If you create an account, fill out a form, send an email to our team, or otherwise send us information through the Site, we collect personal information about you, which may include the following:

- **Contact Data**, which may include your name, country, postal address, email address, job information, telephone number and similar information;
- **Account Data**, which may include your Contact Data, username, password and other login information and other information you upload to your account;
- **Social Media Data**, which may include your social media account name, media interactions with us (e.g., if you "like" or "share" something you see on our social medial platforms), and forum posts; and
- **Correspondence Data**, which may include your requests, comments, survey responses, and any other information you actively provide to us.

Information Automatically Submitted on our Site: When you use our Site, your browser and computer or device automatically provide to us certain technical information about your software and hardware and how you arrived at our Site, including the following:



- **Technical Data**, which includes your browser type and version, device type, your internet protocol (IP) address, your location, and similar information;
- **Usage Data**, which includes the URL that referred you to our Site, the pages you visit as you navigate through our Site (clickstream data), how long you stay on those pages, and the hyperlinks you click on. This information is collected using various technologies including server logs, cookies, web beacons, and other tracking technologies described in greater detail in our cookie policy.

Information from Other Sources: We may collect personal information through other sources such as third party data providers, social media platforms and joint marketing partners to help us offer our services to you. Such personal information consists of Contact Data and Social Media Data.

How We Use Your Personal Information: We use the following categories of personal information for the following purposes:

- **Contact Data** to communicate with you, including responding to your queries, sending you service emails if you become a member of our communities as part of your ongoing membership, and contacting you to administer rewards such as sweepstakes and contests.
- **Account Data** to create and manage your account, enable you to use online interactive forums that we may offer, and provide requested services and information to you.
- **Social Media Data** to interact with you through social media platforms.
- **Correspondence Data** to respond to any specific comments or questions you may have, and consider any survey feedback you provide to help improve our services.
- **Technical Data and Usage Data** to provide, maintain, monitor, secure, debug, customize and optimize our online services to and for you, provide you with customer service and technical assistance, and develop and improve our products and services.

We also use your personal information for the following purposes (collectively, the “General Processing Purposes”), as permitted by applicable law:

- **Performance of Contracts:** To perform our obligations and exercise our rights under our Terms of Use and any other agreement that you conclude with us.
- **Compliance with Laws:** To comply with any legal obligations that apply to us and respond to requests from government authorities.
- **Protection of Legal Interests:** To protect the legal interests, health or safety of a user, us, or other third parties, such as in the event of a complaint or dispute.
- **Marketing Activities:** To provide you with marketing and sales communications, invites and updates that we believe you may be interested in, and tailor the content of those communications based on our understanding of your preferences.
- **Merger or Sale:** In the event that we, or some or all of our assets are acquired by or merged with a third-party entity or in connection with a merger, acquisition, sale, or other change of control, we may transfer some or all of the personal information that we have collected about you to another organization as part of that transaction. If we intend to transfer your personal information in connection with such a transaction, we will proceed as permitted or required by applicable law.

IV. 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.

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

This CCPA Privacy Policy describes 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, please fill in this form or submit an email request to dataprivacy@taittowers.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. 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

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 collected, 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.

Section	Category of personal Information	We collected such personal information to use for the following business or commercial purposes:	We have collected such personal information from the following categories of sources:	We shared such personal information with the following categories of third parties:
1	Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	<p>Clients/job applicants/other third parties</p> <ul style="list-style-type: none"> • To provide legal advice, business, services and to respond to inquiries. • To manage our business operations and administer our client relationship. • To provide relevant marketing to you (e.g. information about events or services that may be of interest. • To address compliance and legal obligations (e.g. checking identity of new clients, prevention of fraud/money laundering). • To consider individuals for employment and contractor opportunities and manage on-boarding procedures. <p>Employees</p> <ul style="list-style-type: none"> • Administering and providing compensation, benefits and other work related allowances. • Administering the workforce (e.g. managing work activities, performance evaluations and promotions, preparing corporate organisation charts, managing entity and intra-entity staffing and team management, managing and monitoring business travel, carrying out workforce analysis, talent management and 	From the data subject, our affiliates, counterparties to transactions or disputes with the data subjects, employers, agents or professional advisers authorised to disclose data on behalf of the data subject and from other publicly available or subscription based sources.	<p>TAIT Group Affiliates</p> <p>Suppliers and service providers where necessary to perform functions on our behalf (e.g. infrastructure/IT services providers, providers of services relating to client intake, global travel, finance, customer relationship management, business analytics and marketing and conference and event hosting).</p> <p>Financial institutions (for invoicing and payment).</p> <p>Corporate purchasers - as part of any sale of Firm assets, transition of service to another provider or in the event of insolvency, bankruptcy or</p> <p>Mandatory disclosures and legal claims (e.g. to comply with any subpoena, court order or other legal process or to comply with any regulatory, governmental or other legally binding request).</p>

		<p>career development, managing employee leave, succession planning, providing employment references, administering ethics and compliance training, facilitating and providing services for the re-location and movement of employees and their families locally and internationally.</p> <ul style="list-style-type: none"> • Complying with employment law obligations. • Subject to applicable laws, monitoring use of the firm's technology systems, databases and property, conducting investigations. • Administration of the compliance hotline. • Communicating with employees and their designated contacts in the event of an emergency. • Responding to legal and/or regulatory requests for information. • Complying with corporate financial responsibilities (audit, accounting and tax requirements). • Managing corporate information technology (e.g. IT support, corporate directory, IT security). • Conducting security screenings (to the extent permitted by law) <p>Internet Protocol Address</p> <ul style="list-style-type: none"> • See section 6 below for details. 		
2	<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,</p>	See section 1 above.	See section 1 above.	See section 1 above.

	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."			
3	Characteristics of protected classifications under California or federal law (classes include race, color, religion, national origin, sex (including pregnancy, childbirth, and related medical conditions), disability, leave, age, citizenship status, genetic information, ancestry, breastfeeding, marital status, gender identity, gender expression, sexual orientation, medical condition including AIDS/HIV, political activities and affiliations, military and veteran status, and status as a victim of domestic violence, assault, or stalking).	See section 1 above.	See section 1 above.	See section 1 above.
4	Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	See section 1 above.	See section 1 above.	See section 1 above.
5	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.	To make our website more intuitive and easy to use. To protect the security and effective functioning of our website.	Via TAIT Group's website.	To our service providers to the extent necessary for the provision of IT services on our behalf. TAIT Group Affiliates
6	Audio, electronic, visual, thermal, olfactory, or similar information.	Audio/visual - where required for legal/regulatory reasons, to keep a record of client instructions or other matters discussed. For purpose of transcribing or preparing a written note of client interviews (recording deleted once transcript or note completed).	Conference calls and video conferences with clients and other third parties. Interviews with clients as part of client feedback program.	TAIT Group Affiliates To our service providers to the extent necessary for the provision of IT services on our behalf. Mandatory disclosures and legal claims (e.g. to comply with any subpoena, court order or other legal process or to comply with any regulatory, governmental or other legally binding request).



7	Professional or employment-related information.	See section 1 above in relation to employees and job applicants.	See section 1 above in relation to employees and job applicants.	See section 1 above in relation to employees and job applicants.
8	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).	See section 1 above in relation to employees and job applicants.	See section 1 above in relation to employees and job applicants.	See section 1 above in relation to employees and job applicants.

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 fill in this form or submit an email request to dataprivacy@tairtowers.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. 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:

- Email a copy of your written declaration authorizing the authorized agent to act on your behalf to dataprivacy@tairtowers.com; 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:

dataprivacy@tairtowers.com

Postal address:

TAIT Group

c/o Data Security

401 W. Lincoln Avenue

Lititz, PA 17520