

California Consumer Protection Act (CCPA) Privacy Notice

Last update: October 2022

[Contents](#)

1.0	Our commitment.....	3
2.0	Notice of collection and use of California Residents personal information	3
3.0	CCPA rights.....	4
3.1	Right to know	4
3.2	Right to delete	4
3.3	Right to opt-out	5
3.4	Right to non-discrimination	5
4.0	Exercising requests	5
5.0	Time frame	6
6.0	Rejecting a request	6
7.0	Contact details and exercising your rights	6
8.0	Information we collect that may have been sold or disclosed.....	7
8.1	How we collect information	7
8.1	Categories of personal information we may collect	7
8.2	Purposes for which we may collect personal information	8
8.3	Categories of personal information we may have sold.....	9
8.4	Categories of personal information we may have disclosed.....	9
9.0	Changes to this CCPA Privacy Notice	9

1.0 Our commitment

This CCPA Privacy Notice must be read in conjunction with our standard Privacy Notice, available from <https://www.ronin.com/privacy> (the "Privacy Notice").

It supplements this Privacy Notice and only applies to individuals who reside in the State of California ("California Residents" or "you") and the work carried out by RONIN International and its subsidiaries ("we" and "us"). This CCPA Privacy Notice informs you about our practices, commitment to privacy, and your rights under the CCPA.

Terms used throughout this document have the meaning given to them in the California Consumer Privacy Act 2018 (the "CCPA").

2.0 Notice of collection and use of California Residents personal information

We collect personal information from California Residents.

The CCPA defines 'personal information' as **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.**

What is excluded?

The following are excluded from the CCPA definition of personal information:

- Deidentified or aggregate consumer information;
- Publicly available information, where such information has been lawfully made public from federal, state, or local government records;
- Medical information governed by California and federal health information privacy laws, e.g., the Health Insurance Portability and Accountability Act of 1996 (**HIPAA**) and the California Confidentiality of Medical Information Act (**CMIA**);
- Information collected as part of a clinical trial (**Common Rule**);
- Personal information regulated by the Fair Credit Reporting Act (**FCRA**);
- Personal information processed, sold, or disclosed pursuant to the Gramm-Leach-Bliley Act (**GLBA**) or California Financial Information Privacy Act (**FIPA**); and
- Personal information processed, sold, or disclosed pursuant to Driver's Privacy Protection Act of 1994.

3.0 CCPA rights

3.1 Right to know

You have the right to know what personal information we collect, use, disclose or sell about you, both at the point of collection and after the fact, including:

- specific pieces of personal information that we have collected about you;
- categories of personal information we have collected about you;
- categories of sources from which we have collected your personal information;
- categories of personal information that we have sold or disclosed for a business purpose about you;
- categories of third parties to whom your personal information was sold or disclosed for a business purpose; and
- the business purpose for collecting or selling your personal information.

We deliver on this by maintaining this CCPA Privacy Notice and by including more information about your personal information at the point of collection; please review this notice carefully, including this CCPA Privacy Notice, when considering whether to share your personal information with us. The CCPA Privacy Notice covers the last 12 months.

To exercise your **right to know** under the CCPA, please contact us using the details recorded below under [Exercising requests](#). If you do so, after confirming your identity, we will disclose to you the information we have collected about during the 12-month period preceding your request and deliver to you, by mail or electronically, and free of charge, a copy of the personal information you have requested as required by CCPA.

3.2 Right to delete

You have the right to request that we delete certain personal information we hold about you. This is subject to certain exemptions permitted by applicable law.

To exercise your **right to delete**, please contact us using the details recorded below under [Exercising requests](#). If you do so, after confirming your identity, we will permanently delete any personal information we hold about you, unless some or all of it is subject to one of the exceptions to your right to delete provided by the CCPA.

Exceptions to the CCPA Right to Delete

Exceptions to your right to delete include, but are not limited to:

- To complete the transaction for which the personal information was collected, provide a service requested by you or that you could reasonably anticipate within

the context of our ongoing business relationship with you;

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality;
- To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business; and
- To comply with our legal obligations under the CCPA or other legal obligations.

3.3 Right to opt-out

You have the right to opt-out from us selling your personal information. To exercise your **right to opt out**, please contact us using the details recorded below under [Exercising requests](#).

3.4 Right to non-discrimination

You have the right not to receive discriminatory treatment as a result of choosing to exercise any of your rights under the CCPA as a California Resident.

Please note that, if you choose to exercise your right to delete some or all the personal information we hold about you, you may be unable to participate in market research activities that we carry out if we are prevented from assessing your suitability for them.

If you have any questions about your right to non-discrimination, please contact us using the details recorded below under [Exercising requests](#).

4.0 Exercising requests

It is important to us that we act on your requests promptly when these are received. Nevertheless, to protect your privacy and the security of your personal information, we must take steps to verify your identity before we can fulfil a request.

If you request to receive a copy (access to) or for us to delete your personal information, we may ask you to provide us with further information about you to verify your identity, so we can make sure you are authorised to make such a request. The type of information we ask for will vary depending on the nature of your request, in other words, the type, volume, and sensitivity of personal information concerned by your request. If further information is required, we will contact you to ask that you provide us with that before we respond or fulfil your request for access or deletion.

We also reserve the right to ask you to sign a declaration that you are the individual whose personal information is concerned by the request. If you are working through an authorised agent to make a request for access, deletion or to opt out on your behalf, we may also carry out further checks before we can fulfil your request.

5.0 Time frame

In accordance with the CCPA, if you exercise your rights **to know** or **to delete** under the CCPA, we will endeavour to come back to you within the following timeframe(s):

- We will confirm receipt of your request within **10** business days, including asking for further information we may need from you to fulfil the request;
- We will endeavour to fulfil the request within **45** calendar days;
- If we anticipate that more time is needed, we will communicate with you about this extension, including our reasons for the additional time required to respond, up to a maximum time frame of **90** calendar days to respond to a request.

6.0 Rejecting a request

If we are unable to verify your identity after a 90-day period since your request was made, or if certain exceptions under the CCPA apply, we may be unable to fulfil all or part of your request under the right to know or right to delete. Where this is the case, we will provide you with our reasons for this, and if we are able to fulfil your request in part, we will deliver (or delete, as applicable) the partial information.

7.0 Contact details and exercising your rights

Our contact details are shown below:

By submitting a form:

<https://www.ronin.com/privacy/ccpa-policy-and-form/>

By e-mail:

compliance@ronin.com

By postal mail:

F.A.O DPO
RONIN International Limited
Harling House, 4th Floor
47-51 Great Suffolk Street
SE1 0BS London, UK

8.0 Information we collect that may have been sold or disclosed

8.1 How we collect information

We will collect personal information from California Residents at various stages, including:

- Information you provide;
- Information collected by our website(s), including through automated means such as third-party cookies and log files used to monitor access to our website(s);
- Information collected during business meetings with current or prospective clients;
- Information collected by our employees or representatives at events we attend;
- Information collected by our employees or representatives from third parties, including publicly available databases and records and social media platforms;
- Information collected when we conduct ad hoc recruitment for quantitative and qualitative market research purposes, via telephone or through online channels;
- When participants take part in surveys, both online and via telephone;
- When collecting information that we need to administer incentives to participants who successfully completed a market research survey we were conducting;

8.1 Categories of personal information we may collect

The categories of personal information we may collect include:

- **Identifiers**, such as
 - Your name
 - Your postal address(es)
 - Your e-mail address(es), including your personal e-mail address, professional e-mail address and preferred e-mail address for incentives;
 - Your telephone number(s), including your home, business, and mobile;
 - Your date of birth;
 - Your Internet Protocol (IP) address;
 - Unique device or cookie identifiers;
 - Information about your social media (including professional networks);
 - Digital fingerprinting information on surveys
- **Other identifiers**
 - Your electronic signature on market research consent forms;
 - Information about potentially protected classifications under applicable law governing the use of personal information, such as information about race, faith and philosophical beliefs, national origin, sexual orientation or sexual life, political opinions and trade union membership;
 - Your banking details associated with incentive processing;
 - Geolocation data, such as

- Demographic information
- **Information relating to your profession or employment**
 - Your employment history and current occupation;
 - Your specialty or level of seniority;
 - Other information relating to your role and level of responsibility;
- **Information relating to your education**
 - Your academic history and areas of specialisation;
- **Other information submitted by participants**
 - Pictures, videos, or other materials submit in market research surveys;
 - Audio, electronic, video recordings of market research surveys;
 - Inferences we may draw from the other categories included in this section which may reflect preferences, characteristics, psychological trends, predispositions, behaviour, attitudes, intelligence, abilities, and aptitudes;
 - Other information we may collect as described in the main Privacy Notice.

8.2 Purposes for which we may collect personal information

We collect personal information for the purposes outlined in our main Privacy Notice.

They are outlined in CCPA-defined terms below:

- Supporting our operational purposes or those of our services providers;
- Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, auditing compliance with this specification and other standards;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- Debugging to identify and repair errors that impair existing intended functionality;
- Short-term, transient use;
- Performing or using services, including maintaining accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, or providing similar services;
- Undertaking internal research for technological development and demonstration;
- Undertaking activities to verify or maintain the quality or safety of a service or

device and to improve, upgrade, or enhance the service or devices;

8.3 Categories of personal information we may have sold

All the categories of information listed [here](#).

8.4 Categories of personal information we may have disclosed

All the categories of information listed [here](#).

9.0 Changes to this CCPA Privacy Notice

From time to time, we may need or choose to amend our CCPA Privacy Notice. We keep it under regular review and may revise it any time. If we change our CCPA Privacy Notice, this change will be reflected on this page and the date at the top of the document will inform you of the date it was updated. Please visit this page at regular intervals and each time you are considering sharing your personal information with us.