

California Consumer Privacy Act Disclosures

Last Modified and Effective Date: December 16, 2022

This notice and policy supplements information contained in the [Privacy Policy](#) (“Privacy Policy”) from Highspot, Inc. and its corporate business affiliates (“Highspot”) and applies solely to residents of the State of California (“consumers” or “you”). Any terms defined in the California Consumer Privacy Act of 2018, as amended from time to time (“CCPA”) have the same meaning when used in this notice and policy. This notice and policy does not reflect our collection, use, or disclosure of California residents’ personal information, or data subject rights, where an exception under the CCPA applies.

1. RIGHT TO KNOW ABOUT PERSONAL INFORMATION COLLECTED AND DISCLOSED, AND TO REQUEST DELETION OF PERSONAL INFORMATION

You have the right to request that we disclose what personal information we collect, use, or disclose about you specifically (“**right to know**”) and to request the deletion of personal information. To submit a request to exercise the right to know, please submit an email request to privacycenter@highspot.com or as described in the “Contact Us” section of our [Privacy Policy](#). To submit a request to delete personal information, please submit an email request to privacycenter@highspot.com or as described in the “Contact Us” section of our [Privacy Policy](#).

Highspot may ask that you provide certain information 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. Highspot will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

The CCPA requires businesses that “sell” personal information, as the term “sell” is defined under the CCPA, to provide California residents the right to opt-out from such sales. The California Privacy Rights Act (“CPRA”) amends the CCPA to broadly define “sale” in a way that may include allowing third parties to receive certain information such as cookie identifiers, IP addresses, and/or browsing behavior to add to a profile about your device, browser, or you. Such profiles may enable delivery of interest-based advertising by such third parties within their platform or on other sites. Depending on how you use the services, we may share the following categories of information for such interest-based advertising, which may be considered a “sale” as defined by the CPRA: (1) device information and identifiers, such as IP address and unique advertising identifiers and cookies; and (2) connection and usage information, such as browsing history or app usage. Although this obligation of the CPRA does not become effective until January 1, 2023, you may opt-out of such advertising cookies within our cookie banner.

We do not have actual knowledge that we sell the personal information of minors under 16 years of age.

2. PERSONAL INFORMATION HANDLING PRACTICES

We have set out below categories of personal information we may collect about California residents and may have collected in the preceding 12 months. For each category of personal information we may have collected, we have included the reference to the enumerated category or categories of personal information in the CCPA that most closely describe such personal information.

Corresponding reference to category of personal information under CCPA definition of personal information

Category of personal information

Identifiers.

Name, Email Address, Mobile Phone Number, Profile Image, Social Media Account Handles, Pronouns, Languages, Job Title/Role, Work Address, Work

	Telephone, Work Fax, SSO Attributes, Unique or User ID
Personal information categories listed in the California Customer Records Act (Cal. Civ. Code § 1798.80(e)).	Name, Signature, Social Security number, Address, Telephone number, Bank Account Number, Credit Card Number, Debit Card Number, or any other financial information
Characteristics of protected classifications under California or federal law.	N/A
Commercial information.	Financial and billing information, such as billing name and address, products or services purchased, obtained, or considered
Biometric Information.	N/A
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 website, application, or advertisement.	Cookies, Cookie IDs, Unique ID or User ID (UID), Feature Usage Analytics, Behaviour Feature Analytics, Aggregated Website Usage Analytics, Crash Reporting Data
Geolocation data.	IP Address, Location data
Audio, electronic, visual, thermal, olfactory, or similar information.	N/A
Professional or Employment related information.	Employer, Job Title/Role, Work Address, Work Telephone, Work Fax, Domain (Organizational ID)
Education information.	N/A
Inferences drawn from any of the information.	Personal Interests, Nationality, Citizenship

Highspot collects such information from the following categories of sources:

- **Directly from You.** We may collect personal information when you: contact and/or communicate with us including when you request information about us and/or our services, register for regular information updates, and request customer or technical support; make information available through our interactive features; transfer information from Highspot to third party platforms, such as your social media platforms; and provide information while attending our conferences, trade shows, webinars, or other events either hosted by or attended by Highspot.
- **Using cookies and automatic collection methods.** Highspot and its service providers may collect personal information from the computer, tablet, phone, or other device that you use to access our Sites, to open an email, or to click on an advertisement from Highspot. Highspot does not respond to “do not track signals.”

- **Third Parties, including Service Providers.** We may collect personal information about you that you have made available via your privacy settings when you access our Sites through a third-party application, including, by way of example and without limitation, social media and social networking applications and/or websites. We may also collect personal information from service providers that we use to perform services on our behalf or assist us with our provision of services to you, and from other third parties that we choose to collaborate or work with.

Highspot collects, uses, retains, and/or discloses your personal information for the purposes described below:

- Establish your identity and verify the accuracy of your information.
- Provide you with our sites and services, including to: provide you customer or technical support; allow you to register for our events; and enable service providers to perform services on our behalf to assist us with our provision of services to you.
- Manage our relationship and communications with you.
- Handle and record consumer rights requests, including opt-ins and opt-outs.
- Market and/or enable our products and services.
- Engage in research and development efforts.
- Assess and pursue potential business opportunities.
- Monitor, protect and improve Highspot security assets and resources, including devices, systems, customer data, infrastructure, and Highspot network.
- Audit interactions and transactions with you, identify irregular or suspicious website behavior, and prevent fraud or other unauthorized or illegal activity,
- Enforce our agreements, terms and policies, comply with applicable laws and regulatory requirements, and respond to lawful requests, court orders, and legal processes.
- Create de-identified and/or aggregated information.

3. **TRANSFER OF PERSONAL INFORMATION**

In the preceding 12 months, Highspot disclosed the above categories of personal information to the following categories of third parties for a business purpose, in some cases as directed by you:

- **Highspot Affiliates and Business Partners.** In particular, we may transfer your personal information to our affiliates for administrative purposes, including IT management, to provide services to you, and to support and supplement the services we provide. We may also transfer your personal information to business partners to provide you with a product or service you have requested or to jointly offer a product or service to you.
- **Third Parties, including Service Providers.** In particular, we may use service providers to perform services on our behalf or assist us with the provision of services to you, including to provide us with IT support, hosting, payment processing, customer service, marketing, advertising, application services, and related services. We may also transfer your personal information to third parties in connection with a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, as permitted by law and/or contract.
- **Government Regulatory Authorities.** In particular, we may disclose your personal information to relevant government regulatory authorities if we believe the disclosure is reasonably necessary to comply

with a law, regulation, or legal request. We may also transfer your personal information to third parties if we, in good faith, believe doing so is required to enforce our policies, terms, or contracts, to collect amounts owed to us, to assist us with an investigation or prosecution of a suspected or actual illegal activity, or to otherwise protect your, our, or others' rights, property, or safety.

4. RIGHT TO NON-DISCRIMINATION FOR THE EXERCISE OF CCPA RIGHTS

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

5. 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 the agent provides proof that you gave the agent signed permission to submit the request; and
- You directly confirm, in writing, with Highspot that you provided the authorized agent with permission to submit the request.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please provide any information Highspot requests to verify your identity. The information that Highspot asks 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 4121 to 4130, 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.

7. CONTACT FOR MORE INFORMATION

If you have any questions or comments about this notice and policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, please do not hesitate to contact us at:

Highspot, Inc.
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Suite 400
Seattle, WA 98121
USA

Email address: privacy@highspot.com