NEUREALITY PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Last updated: November 17, 2020

This California Privacy Notice applies to Consumers residing in California (hereinafter the “California Privacy Notice” or “Notice”), who have some additional rights with respect to their Personal Information under the California Consumer Privacy Act of 2018 (the “CCPA”). The terms “personal information”, “business purpose”, “commercial purpose”, “sale” and “service provider” as used in this Notice have the meanings ascribed to them in the CCPA. Capitalized terms used but not defined in this Notice will have the meanings set out in the Privacy Policy (the “Privacy Policy”). If there is any conflict or inconsistency between the terms of this Notice and the Privacy Policy, the terms of this Notice will govern.

1. CATEGORIES OF PERSONAL INFORMATION WE COLLECT

In the preceding 12 months, we have collected the following categories and types of personal information:

- **Identifiers**, such as name, email address and device ID.
- **Personal characteristics**, solely for employment candidates, such as education and employment history, and characteristics of protected classifications under California law, such as gender and age (over 40), and any other personal information shared with us by candidates.
- **Technical Identifiers**, such as internet and other similar network activity, such as browsing history and cookie history.

For more information about the types of personal information we collect, please see the “What Types of Information do you collect?” section in our Privacy Policy.

2. BUSINESS OR COMMERCIAL PURPOSE FOR COLLECTING, SHARING AND SELLING INFORMATION.

We collect and share personal information for the following business and commercial purposes: authenticating you when you use our Website, providing customer support, detecting security incidents, debugging and fixing errors, research, and activities to maintain the quality of our Website and services.

We do not put your data on the open market, act as data brokers or otherwise trade in your data. However, certain standard generally accepted business practices maybe deemed as “Sale” of data under the CCPA, such as when we utilize third party service providers that provide us with services, while they retain certain ability to use your data for their own business needs (e.g. Google Analytics, fraud detection services, etc.).

If you are a California customer, you have a right under the new definition of “sale”, to request to opt-out of certain data transfers and sharing of personal activities which we operate. Please refer to section 3, “Your California Consumer Rights”, below for information on how you can exercise your rights.

For more details on how and with whom we share your data, please refer to the “WHO DO YOU SHARE MY INFORMATION WITH AND WHY?” and “DO YOU USE COOKIES OR SIMILAR TRACKING TECHNOLOGIES?” sections in our main Privacy Policy.
3. **YOUR CALIFORNIA CONSUMER RIGHTS.**

California consumers have the right to request access to the specific pieces of personal information we have collected about them in the last 12 months. You may make this request up to two times in a 12-month period.

You may also request additional details about our information practices, including the categories of personal information we have collected about you, the categories of sources of such collection, the business or commercial purpose for collecting or selling personal information, the categories of third parties with whom we share and sell your personal information, the categories of personal information we have disclosed and “sold” about you in the preceding 12 months, and the categories of third parties to whom we sold personal information in the preceding 12 months.

If you are a California consumer, you also have the right to request deletion of your personal information (subject to certain exceptions), to opt out of sales of personal information and to receive equal service and price and not be discriminated against even if you exercise any of your CCPA rights (unless permitted by applicable law, such as if the differences are reasonably related to your information).

California consumers may make a rights request by writing to us at office@neurealty.ai. In order to process your request, we may require you to provide us with additional information in order to allow us to reasonably verify you are the relevant data subject.

Additionally, users may opt-out of the “sale” of information as described above, by clicking the “Do Not Sell My Personal Information” link at the bottom of this page.