

DELUXE PRIVACY POLICY – CALIFORNIA (CCPA)

This PRIVACY POLICY FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Policy of Deluxe Media Inc. and its subsidiaries and affiliates (collectively, “we,” “us,” or “our”) and applies to site visitors, customers, users, employees, independent contractors, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months. Going forward, we anticipate continuing to collecting the same categories of personal information, which are the following:

Category	Examples
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, tax ID number, account name and password driver's license number, passport number, or other similar identifiers.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Signature, bank account number or any other financial information, medical information (including symptoms of illness), or health insurance information.
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, ethnicity, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status.
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
G. Geolocation data.	Physical location or movements, including any denial of entry (and time/date of denial) to our facilities.
I. Professional or employment-related information.	Current or past job history, performance evaluations, language skills.
J. Educational information	Education history and information.

In the 12 months prior to the date of this policy, we obtained the categories of personal information listed above from the following categories of sources, and will continue to do so:

- When you interact with the Sites, during the course of your employment or engagement with us as a freelancer or independent contractor, when you apply for a position with us, when you create an account on our Sites, when you contact us or visit our offices or studios, when you request information



- from us about our services, and when you otherwise voluntarily provide information to us.
- From third-parties that provide background information or references to us in connection with our evaluation of potential job candidates.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes: To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to provide certain services, we will use that information to provide those services.

- To provide you with information, products or services that you request from us.
- To provide you with updates and other notices concerning our products or services.
- To provide employment benefits and payments and for human resources-related activities
- To engage contractors to perform services for us, including translation services
- To operate our business
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our Sites and services and present the contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or healthy and safety of us, our clients or others.
- To prevent fraud, activities that violate our Terms of Service or that are illegal.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

The following chart describes the categories of personal information that we disclosed to third parties for a business purpose in the 12 months prior to the date of this Policy:

Categories of Consumers’ Personal Information	Categories of Third Parties With Which We Shared Personal Information for a Business Purpose
<u>Personal Identifiers</u> : A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, tax ID number, account name and password driver’s license number, passport number, or other similar identifiers.	Service providers that provide customer relationship management (CRM) services; assist us in operating, analyzing, and displaying content on our Sites; provide analytics information; advertise or market our services; assist in evaluating job candidates and employees; provide employee benefits and related services; provide website hosting, services; provide legal and accounting services.
<u>California Records Act Information</u> : Signature, bank account number or any other financial information, medical information (including symptoms of illness), or health insurance information.	Service providers that provide employee benefits and related services



<p><u>Protected Class Information:</u> Age (40 years or older), race, ethnicity, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status.</p>	<p>Service providers that provide employee benefits and related services; assist in payment processing for freelancers</p>
<p><u>Internet or other electronic network activity information:</u> Device and browser type, browsing and search history on our Sites, and information regarding interaction with our Sites and our advertisements.</p>	<p>Service providers that provide data security services and cloud-based data storage; host our Sites and assist with other IT-related functions; provide website hosting, webcast and teleconference services; advertise and market our products; and provide analytics information.</p>
<p><u>Professional or employment-related information.</u> Current or past job history, performance evaluations, language skills.</p>	<p>Service providers that provide employee benefits and related services; assist with payments made to freelancers and other independent contractors; assist in evaluating and hiring job and freelance candidates</p>

Additional Information About How We May Share Personal Information

We may also share your personal information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property or safety of others, including to law enforcement agencies, and judicial and regulatory authorities. We may also share your personal information with third parties to help detect and protect against fraud or data security vulnerabilities. And we may transfer your personal information to a third party in the event of a sale, merger, reorganization of our entity or other restructuring.

In the preceding twelve (12) months, we have not sold any personal information and we do not sell personal information.

Cookies and Other Trackers

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies allow a website to recognize a user’s device. You can find more information about cookies at <http://www.allaboutcookies.org>. We do not track users’ activities over time and across the internet, nor do we allow third parties to do so.

Your Rights and Choices

If you are a California resident, you may have certain rights regarding your personal information, in accordance with California law.

California Consumer Privacy Act (CCPA)

CCPA provides consumers (California residents) with specific rights regarding their personal information This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.



- Categories of personal information that we disclosed for a business purpose about you;
- The categories of third parties with whom we share that personal information for a business purpose.
- The specific pieces of personal information we collected about you (also called a data portability request).

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies, within the timeframes permitted under applicable statutes.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by email to Legal.Contact@bydeluxe.com.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

If you would like to designate an agent to act on your behalf, they will need to be registered with the California Secretary of State. Additionally, you and the agent will need to comply with our verification process. Specifically, if the agent submits requests to access, know or delete your personal information, the agent will need to provide us with your signed permission indicating the agent has been authorized to submit the request on your behalf. We will also require that you verify your identity directly with us or confirm with us that you provided the agent with permission to submit the request.

Please note that this subsection does not apply when an agent is authorized to act on your behalf pursuant to a valid power of attorney. Any such requests will be processed in accordance with California law pertaining to powers of attorney.



You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-discrimination

We will not discriminate or retaliate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

For employees, this policy is not meant to supersede the company's existing policies regarding discrimination, harassment, and retaliation. Please refer to the Employee Handbook for additional information.

California Shine the Light

California Civil Code Section 1798.83, also known as the "Shine the Light" law, permits California residents to annually request, free of charge, information about certain categories of personal information a business has disclosed to third parties for direct marketing purposes in the preceding calendar year. We do not provide personal information to third parties for their marketing purposes.

California Do Not Track

Some browsers have a "do not track" feature that lets you tell websites that you do not want to have your online



activities tracked. At this time, our Sites do not respond to browsers' do not track signals.

Personal Information of Minors

Our products and services are not directed to minors under the age of 13. We do not knowingly sell the personal information of minors under the age of 16.

Changes to this Policy

We reserve the right to amend this policy at our discretion and at any time.

Accessibility

We are committed to ensuring that our **communications** are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us at Legal.Contact@bydeluxe.com.

Contact Information

If you have any questions or comments about this policy, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at: Legal.Contact@bydeluxe.com.

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