



# California Consumer Privacy Act Privacy Notice

## PURPOSE AND GENERAL PRINCIPLES

This California Consumer Privacy Act Notice (Notice) is provided by Chicanos Por La Causa, Inc. and its affiliated companies as described under Section "CPLC Companies Providing This Notice" herein (collectively, "CPLC"). These companies are also referred to in this Notice as "we" or "us."

This Notice explains how we collect, use, retain, and disclose personal information about California residents, at or before the point of collection. The Notice also explains certain rights that California residents have under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (the "CCPA"). Our website Legal and Privacy Notices further describe our policies and practices related to your privacy.

The CCPA only applies to information about residents of California. If you are not a resident of California, you may submit a request that we stop collecting or sharing your personal information, and we may process it, as described in this Notice, even though the CCPA does not require us to do so. In accepting, processing, and responding to requests by individuals who are not California residents, we will apply the same limitations and exceptions under the CCPA as requests made by California residents. We reserve the right to change or stop the practice of accepting requests from U.S. individuals who are not California residents.

## PERSONAL INFORMATION UNDER THE CCPA

"Personal Information" is defined by the CCPA as any information that identifies, relates to, describes, can be reasonably be associated with, or could reasonably be linked, directly or indirectly, with a resident or household.

Personal Information **does not include** publicly-available information lawfully made available from federal, state, or local records, and de-identified or aggregated consumer information. Aggregated information includes Internet Protocol addresses, browser type, device type, operating system, page views, referring URLs, destination URLs, dates and times of site visits, and other information collected primarily for statistical purposes. The CCPA also exempts certain types of information such as medical information and consumer credit reporting information.



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### CATEGORIES OF PERSONAL INFORMATION WE COLLECT AND SHARE ABOUT CONSUMERS

We collect Personal Information in a variety of contexts. The Personal Information that we collect about a specific California resident may depend on our relationship or interaction with that individual.

During the past twelve (12) months, we have collected and/or disclosed to third parties or services providers the following categories of Personal Information:

Category Name	Category Description
Personal Identifiers	Personal unique identifiers, such as full name and federal or state issued identification numbers including Social Security number, driver's license number, and passport number
Personal Information	Personal information, including contact details (e.g., telephone number and address), financial information (e.g., account number and balance), payment card details (e.g., credit and debit card numbers), and medical and health insurance information
Characteristics of Protected Classes	Characteristics of protected classes or groups under state or federal law, such as sex, disability, citizenship, primary language, immigration status and marital status
Purchase Information	Purchase information, such as products and services obtained and transaction histories
Internet or Online Information	Internet or online information (e.g., browsing history) and information regarding interaction with our websites, applications, or advertisements
Geolocation Data	Geolocation data, such as device location
Audio and Visual Information	Audio, electronic, visual, thermal, olfactory, or similar information, such as call and video recording
Employment Information	Professional or employment-related information, such as work history and prior employer, information from background checks, resumes, and personnel files
Education Information	Education information subject to the federal Family Educations Rights and Privacy Act, such as student records and confirmation of graduation
Health Information	Health information subject to the Health Information Portability and Accountability Act, such as medical treatment and payment information



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Inferences	Inferences based on information about an individual to create a summary about, for example, an individual’s preferences and characteristics
Sensitive Personal Information	<ul style="list-style-type: none"> <li>• Social Security number, driver’s license, state identification card, or passport number;</li> <li>• Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account;</li> <li>• Postal address, military identification number</li> <li>• Precise geolocation;</li> <li>• Racial or ethnic origin, religious or philosophical beliefs, citizenship, or immigration status;</li> <li>• The contents of mail, email, and text messages unless we are the intended recipient of the communication;</li> <li>• Health Information, sexual orientation.</li> </ul>

### SOURCES OF PERSONAL INFORMATION

The Personal Information CPLC collects is from the information you, or others acting your behalf, provide directly to us through applications for goods or services, the processing of such applications, and by subscribing to any communication lists.

### PURPOSE FOR COLLECTING AND DISCLOSING PERSONAL INFORMATION

The purposes for which we collect and disclose personal information depend on a variety of reasons, including the nature of our relationship with you. The table below explains the purposes for which we collect, sell, or share Personal Information.

Purpose of Collecting Personal Information	Examples
Provide and manage services	<ul style="list-style-type: none"> <li>• Determine eligibility for services</li> <li>• Identifying, authenticating, and fulfilling your service requests</li> </ul>



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	<ul style="list-style-type: none"> <li>• Fulfill the purposes or requirements of third-party service providers.</li> <li>• Send you recommendations on products and services of interest to you</li> </ul>
<p>Manage and improve CPLA outreach and purposes.</p>	<ul style="list-style-type: none"> <li>• Conduct research to ensure that the organization’s mission is being accomplished</li> <li>• Provide you with personalized experiences</li> <li>• Understand who visits our website</li> <li>• Manage analyze and measure our content and advertising</li> <li>• Improve CPLC products and services, including new product and service development through your access or use of our website</li> </ul>

## CONSUMER PERSONAL INFORMATION RIGHTS

California residents have the right to know what Personal Information of theirs CPLC has collected, sold, or shared, and to whom. See sections “Rights and Requests under the CCPA” and “How to Make Requests” below for more information.

## CATEGORIES OF THIRD PARTIES AND OUR DISCLOSURE OF PERSONAL INFORMATION

The categories of third parties to whom we disclose Personal Information about a specific individual depend on, among other things, our relationship or interaction with a specific California resident. Such third parties include:

- Government agencies, including in instances to provide services and satisfy regulatory and legal requirements



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## DATA RETENTION

We retain your Personal Information for as long as reasonably necessary to fulfill the transactions you have requested or for legitimate business purposes, such as complying with CPLC legal obligations with federal, state, and local laws. Under our record retention policy, we are required to destroy Personal Information we no longer need according to specific retention periods. However, we may need to hold Personal Information beyond these retention periods due to regulatory requirements or in response to a regulatory audit, investigation, or other legal matters. These requirements also apply to our third-party service providers.

## RIGHTS AND REQUESTS UNDER THE CCPA

The CCPA defines a “sale” as the disclosure of Personal Information for monetary or other valuable consideration. CPLC does not sell Personal Information, including Sensitive Personal Information that is subject to the CCPA’s sale limitation.

If you are a California resident, you have the right to request that we:

1. Disclose to you the following information covering the 12-month period prior to your request (“Request to Know”):
  - a. The categories of Personal Information we collected about you;
  - b. The categories of sources from which we collected the Personal Information;
  - c. The business or commercial purpose for collecting Personal Information about you;
  - d. The categories of third parties to whom we disclosed Personal Information about you, and the categories of Personal Information disclosed; and
  - e. The specific pieces of Personal Information we collected about you;
2. Delete Personal Information we collected from you and to tell our service providers to do the same, subject to certain exceptions where we are legally required to keep your Personal Information (“Request to Delete”).
3. Correct inaccurate personal information that we maintain about you (“Request to Correct”).
4. Limit the use and disclosure of sensitive personal information to that which is necessary to perform services or provide goods reasonably expected by an average consumer requesting those goods or services. .



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In addition, you have the right to be free from discrimination by a business for exercising your CCPA privacy rights, including the right as an employee, applicant, or independent contractor not to be retaliated against for exercising your CCPA privacy rights.

### HOW TO MAKE REQUESTS

If you are a California resident you can make a Request to Know, Delete, or Correct by:

1. Contacting us through our compliance privacy line at (888) 313-4547
2. Submitting your request at [privacy@cplc.org](mailto:privacy@cplc.org)

For all other individuals, we will ask you to provide the following information to identify yourself:

- Name, contact information, social security or individual taxpayer identification number, date of birth; and
- A copy of government issued photo ID. We accept your Driver's license, or State ID.

When you make a Request to Know, Delete, or Correct, we will attempt to verify that you are who you say you are. For example, we will attempt to match information that you provide in making your request with other sources of similar information to reasonably verify identity.

### RESPONDING TO REQUESTS

Privacy and data protection laws, other than the CCPA, apply to much of the Personal Information that CPLC collects, uses, and discloses. When these other laws apply, Personal Information may be exempt from, or outside the scope of, a request to Know, Delete, or Correct. For example, information subject to certain federal privacy laws, such as the Gramm-Leach-Bliley Act or the Health Insurance Portability and Accountability Act is exempt from CCPA Requests. As a result, we may decline all or part of your Request related to exempt Personal Information. This means that we may not provide some, or all, of this Personal Information when you make a Request to Know. Also, we may not delete or correct, some or all, of this Personal Information when you make a Request to Delete or Correct.

As examples, our processing of or response to a Request to Know, Delete, or Correct may not include some or all of the following Personal Information:



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- Healthcare Patient Charts. Personal Information connected with Healthcare Patient Charts used for personal, family or household purposes. We have other privacy notices providing certain information on use and sharing of this data, for example, CPLC's Privacy Notice, available at <https://cplc.org/about/legal-privacy.php>

### AUTHORIZED AGENTS

If you are a California resident, you may authorize an agent to make a request on your behalf. A California resident's authorized agent may make a request on behalf of the California resident by using the submission methods listed above under "How to Make Requests." As part of our verification process, CPLC may request that you provide, as applicable:

- For an individual ("requestor") making a request on behalf of a California resident:
  - The requestor's name; contact information; social security or individual taxpayer identification number; date of birth; and Driver's License, or State ID.
  - The name; contact information; social security or individual taxpayer identification number; date of birth; and Driver's License, or State ID of the California resident on whose behalf the request is being made.
  - A document to confirm that the requestor is authorized to make the request. We may accept, as applicable, a signed permission by the California resident on whose behalf the request is made, copy of a power of attorney, legal guardianship or conservatorship order, or a birth certificate of a minor if the requestor is the custodial parent.
- For a company or organization ("legal entity requestor") making a request on behalf of the California resident:
  - The legal entity requestor's active registration with the California Secretary of State.
  - Proof that the California resident has authorized the legal entity requestor to make the request. CPLC accepts as applicable, a signed permission by the California resident on whose behalf the request is made, copy of power of attorney, or legal guardianship or conservatorship order.
  - The name; contact information; Social Security or individual taxpayer identification number; date of birth; Driver's License and State ID of the California resident on whose behalf the request is being made. From the individual who is acting on behalf of the legal entity requestor, proof that the



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- individual is authorized by the legal entity requestor to make the request. We accept a letter on the legal entity requestor's letterhead, signed by an officer of the organization.
- If you are a minor or a legal guardian of a minor you may submit a request by emailing [privacy@cplc.org](mailto:privacy@cplc.org) or calling the CPLC Compliance Privacy line at (888-313-4547).

## DE-IDENTIFIED INFORMATION

Where CPLC maintains or uses de-identified information we will continue to maintain and use the de-identified information only in a de-identified fashion and will not attempt to re-identify the information.

## CHANGES TO THIS NOTICE

We may change or update this Notice periodically. When it is updated we will post the revised Notice on this webpage indicating when the Notice was "Last Updated."

## CPLC COMPANIES PROVIDING THIS NOTICE

This Notice is provided by CPLC, Inc. and its subsidiaries that either: (1) act as a business within the meaning of the CCPA, or (2) are controlled by CPLC, Inc. and use CPLC, Inc.'s name. As an example, companies providing this notice include Chicanos Por La Causa California.

## CONTACT US

If you have any questions or concerns about CPLC, Inc.'s privacy policies and practices, please contact us:

Chicanos Por La Causa, Inc.

Attn: Privacy Officer

1112 E. Buckeye Road

Phoenix, AZ 85034

OR

**EMAIL:** [privacy@cplc.org](mailto:privacy@cplc.org)

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Review Dates: