

## Global Compliance Update CCPA edition

### What is the California Consumer Privacy Act (CCPA) & how does it apply to Sermo users?

CCPA is a comprehensive state privacy law which came into effect on January 1st, 2020. It regulates how businesses handle Personal Information (PI) of Californian residents and impacts most market research and data analytics companies. The following Data Privacy Rights granted via CCPA to California residents are most relevant to Sermo users:

- The right to know what personal information is being collected about them.
- The right to access and edit their personal information.
- The right to delete personal information.

### How does Sermo handle Personal Information (PI)?

Sermo does not sell users' PI. We only disclose PI to clients, service providers, and 3rd parties under one of the following capacities:

1. When such request is associated with a legitimate business purpose;
2. When explicit and informed consent has been obtained directly from a user;
3. Or, when such request is associated with legal obligations.

### How is Sermo ensuring CCPA compliance?

We have worked diligently to incorporate CCPA into our Global Data Protection Strategy by:

- Updating our Privacy Policy with further specifics on how Sermo handles Personal Information.
- Publishing a CCPA-specific Privacy Statement, detailing our acknowledgement of Californian's new Data Privacy Rights.
- Notifying users concerning updates made to our T&Cs and Policies.
- Building enhanced communication channels so users can submit verifiable requests related to Data Privacy Rights.
- Updating contractual requirements to ensure all sub-contractors/vendors working in partnership with Sermo acknowledge and undertake to comply with the CCPA.
- Updating Data Usage Agreement templates to account for CCPA compliance.
- Providing next level cyber-security in tandem with the following data security best practices:
  - Data minimization: addressing limits to all Personal Information collected.
  - Data retention: PI is only retained when indispensable for the maintenance of business, backup, audit, and legal purposes.
  - Data encryption: PI is always encrypted at transit and at rest.
  - Restricted access: Sermo's IT Security Team governs our data assets under key security high standards.
  - Documentation: Written information security plans (WISPs).