

DRIFTY, CO. (D/B/A IONIC)

CALIFORNIA PRIVACY NOTICE

Last Updated: July 29, 2021

This California Privacy Notice (the "Notice") sets forth the disclosure obligations of Drifty Co. (d/b/a Ionic), and its subsidiaries and affiliates (collectively, "Drifty," "we", "us" and "our") under California law, including the California Consumer Privacy Act of 2018 ("CCPA") and the California Civil Code section 1798.83, as amended. This Notice provides the additional details regarding the information defined as 'personal information' under applicable California law and related to a California resident or household ("Consumers", "User" or "you") referred to as "Personal Information." This Notice describes the categories of Personal Information Drifty has collected, the categories of Personal Information Drifty has disclosed, the categories of Personal Information Drifty has sold (if any), and a description of the Consumer's rights. This Notice supplements the information contained in the Drifty Privacy Policy.

Categories of Personal Information Drifty Collects

We collect Personal Information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a Consumer or device.

Personal Information does not include (i) publicly available information that is lawfully made available to the general public by way of federal, state, or local government records; (ii) de-identified or aggregated consumer information; and (iii) information excluded from the CCPA's scope, like: (a) health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data, and (b) Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We have collected the following categories of Personal Information from Consumers within the last twelve (12) months:

Category Personal Information (corresponds to categories listed in CCPA §1798.140(o)(1))	CCPA Examples	Collected
A. Identifiers	A real name, alias, postal address, unique personal identifier,	Yes

	online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	
B. Personal information listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	Yes
C. Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	No
D. Commercial information	Records of personal property, products or Services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	No
E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No
F. Internet or network activity	Browsing history, search history, information on a Consumer's interaction with a Website, application, or advertisement.	Yes
G. Geolocation data	Physical location or movements.	No
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information	Current or past job history or performance evaluations.	Yes
J. Non-public education information	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No

K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No
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In addition to the information you may provide to us as set forth below, if you apply for a job on our website or become an employee, we may also collect:

- A. Identifiers: your account name, Social Security number, driver's license number, passport number, or other similar identifiers.
- B. Personal Information(as listed in the CCPA): Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, or any other financial information, or health insurance information.
- G. Geolocation Data: physical location when you apply for a job or interact with our website.
- I. Professional or employment-related information: current or past job history.
- J. Non-public education information: Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes.
- K. Inferences drawn from other personal information: profiles reflecting a person's preferences and behavior, for example, as part of management training.

Sources of Personal Information

Drifty obtains the categories of Personal Information listed in the Table above from the following categories of sources:

- *Directly from you.* For example, (i) if you visit our websites, respond to a survey, participate in a telephone interaction, fill out a registration form, (ii) if you fill out a form or communicate with us through one of our websites to receive information about our business to business services or to schedule a demonstration of our services, products or programs, and (iii) if you expressed interest in being contacted by us at a trade show in which we participated or hosted.
- *Indirectly from you.* For example, from your activity on our Website.
- *Directly and indirectly from activity on our websites.* For example, from observing your actions on our websites or through your submission of an online form requesting a demonstration of one of our products or services.
- *From Third Parties that contract with us or interact with us in connection with the services we perform.* For example, from (i) vendors and partners that help us to build contact lists, supplement or update your information in our database, or confirm/verify our records and information are accurate and up to date, (ii) third parties that may contact you, on our behalf, to provide you relevant content, or (iii) third parties that integrate their services or products with ours or provide us access to their services.

Use of Personal Information

We may use or disclose the Personal Information we collect for one or more of the following business purposes:

- As described in the Privacy Policy <https://ionic.io/privacy>.
- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or Services, we will use that Personal Information to respond to your inquiry. If you provide your Personal Information to purchase a product or service, we will use that information to process your payment and facilitate activation. We may also save your information to facilitate new product orders or process returns.
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Drifty's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Drifty about our Users is among the assets transferred.

Drifty will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

Drifty 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.

We share your Personal Information with the following categories of third parties:

- As described in the Privacy Policy <https://ionic.io/privacy>.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Drifty has disclosed the following categories of Personal Information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records Personal Information categories.

Category F: Internet or network activity.

Category I: Professional or employment-related information.

We disclose your Personal Information for a business purpose to the following categories of third parties:

- Service providers.

Sales of Personal Information

For purposes of the CCPA, Drifty has not sold Personal Information in the preceding twelve (12) months.

Your Rights and Options

The 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. Please note that these rights are not absolute and in certain cases are subject to conditions or limitations as specified in the CCPA:

Access to Specific Information and Data Portability Rights

You have the right to request that Drifty 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 (see *Exercising Access, Data Portability, and Deletion Rights*), 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.
- Our business or commercial purpose for collecting or selling that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you (also called a data portability request).
- If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
 - sales, identifying the Personal Information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that Drifty 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 (see *Exercising Access, Data Portability, and Deletion Rights*), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- 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.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or

prosecute those responsible for such activities.

- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another Consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- 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.
- Enable solely internal uses that are reasonably aligned with Consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- 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 either:

- Calling us at +1 (608) 807-5560
- Visiting <https://ionic.io/privacy>

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. 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 forty-five (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.

Personal Information Sales Opt-out and Opt-in Rights

We do not sell personal information to third parties.

Non-Discrimination

We will not discriminate 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.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your Personal Information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits Users of our Website that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@ionic.io, or write us at: Drifty Co. (d/b/a Ionic), 121 S. Pinckney St. Suite 300 Madison, WI 53703; Attn: Privacy.

Changes to Our Privacy Notice

Drifty reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's

effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

Contact Information

If you have any questions or comments about this notice, the ways in which Drifty collects and uses your information described herein (and in the Drifty Privacy Policy), your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Website: <https://ionic.io>

Email: privacy@ionic.io

Postal Address:

Drifty Co. (d/b/a Ionic)

121 S. Pinckney St.

Suite 300

Madison, WI 53703

Attn: Privacy