

# California Consumer Privacy Act

Last Updated July 13, 2023

The California Consumer Privacy Act of 2018 (“**CCPA**”) provides certain rights to residents of California. This section of our Navigator Privacy Policy applies if you are a natural person who is a resident of California (“**California Consumer**”) and uses the Navigator Services. This notice (the “**California Privacy Notice**”) does not apply to personal information we collect from our employees and job applicants in their capacity as employees and job applicants. This California Privacy Notice supplements the information in our Privacy Policy. Certain terms used herein have the meanings given to them in the CCPA.

The following sets forth the categories of personal information we collect through the Navigator Services for which we control the purposes for which we may use that information.

## 1. Categories of Personal Information We Collect About You through the Navigator Services

As described further in our Navigator Privacy Policy, in the preceding twelve months, we may have collected the below categories of personal information directly from your use of the Navigator Services for business or commercial purposes:

- **Device Information and Device Identifiers**, e.g., IP address, device locale, carrier, operating system, country code, mobile platform, device model, screen resolution, screen size, and advertising identifiers associated with certain devices.
- **Connection and Usage Data**, e.g., User-entered queries, user interactions with the Navigator Services, and app interactions on mobile devices.
- **General Location**, e.g., country code.

We collect each category of personal information from the following sources: (1) through your use of the Navigator Services; (2) Partners; and (3) affiliates.

The following chart provides information about the business or commercial purposes for collecting and using information about you for every category of personal information we collect. Additional information concerning the business and commercial purposes is set forth in the “How Does Branch Use Information Collected by the Navigator Services, and What Information Does Branch Use to Provide the Navigator Services?” section of our Privacy Policy. We may use the categories of personal information identified in this California Privacy Notice about our California Consumers for our operational purposes where the use of such personal information is reasonably necessary and proportionate to achieve the operational purpose for which the personal information was collected or

processed or for another operational purpose that is compatible with the context in which the personal information was collected.

### **Purposes of Use**

#### **Provide the Services, for example:**

- Fulfilling Partners' and prospective Partners' requests for the Navigator Services including processing data at the Partner's direction.
- Combining data from various sources, including data from various Partners or third parties.
- For internal and Partner business purposes, including to support the Branch Platform, develop new products and services, market products or services, and support the products and services of our Partners.
- To better understand how and from where Users come to click on certain deep links and what types of links are popular.
- To understand and resolve technical issues with the Branch Platform.

#### **Customize or understand your experience, for example:**

- Serving nonpersonalized, contextual advertisements or personalized on-device advertisements in connection with Users' queries.
- Creating profiles associated with your device for non-advertising purposes, including analytics and measuring your interactions.

#### **Secure the Branch Platform and prevent fraud, for example:**

- Monitoring, preventing, and detecting fraud, such as through verifying your identity
- Combatting spam or other malware or security risks
- Monitoring, enforcing, and improving the security of our Services

#### **Defend our legal rights and comply with the law**

- Complying with any applicable procedures, laws, and regulations where it is necessary for our legitimate interests or the legitimate interests of others
- Establishing, exercising, or defending our legal rights where it is necessary for our legitimate interests or the legitimate interests of others (e.g., to enforce compliance with our [Terms and Conditions](#), [Navigator Privacy Policy](#), or to protect our Services, Users, or others)

#### **Improve our offerings, for example:**

- Improving the Navigator Services, including to develop the results for User queries and improve the relevance and/or usefulness of the results.

## **2. How We Disclose Your Information**

We disclose each category of personal information collected from and about you as discussed above

for various business purposes to each of the following third parties.

- **Our Affiliates.** We may disclose information we collect within our family of companies to deliver products and services to you, and enhance our products, services, and your customer experience.
- **Service Providers that perform services on our behalf:** including billing and payment processing, sales, marketing, advertising, data analysis and insight, research, technical support and customer service, data storage, security, fraud prevention, and audit and legal services.
- **Third Parties for Legal Purposes.** By using the Navigator Services, you acknowledge and agree that we may access, retain, and disclose the information we collect and maintain about you if required to do so by law or in a good faith belief that such access, retention or disclosure is reasonably necessary to: (a) comply with legal process or a regulatory investigation (e.g., a subpoena or court order); (b) enforce our Terms and Conditions, our Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; and/or (d) protect our rights, property or personal safety, or that of our agents and affiliates, our users and/or the public. This includes exchanging information with other companies and organizations for information security, fraud protection, spam/malware prevention, and similar purposes.
- **Third Parties in a Business Transaction.** We may disclose information in connection with an actual or contemplated corporate transaction, including for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all of our assets.
- **Consent:** With your consent and as permitted by law, we may disclose your data to any other third parties in any other circumstances.

We do not currently “sell” or “share” personal information with third parties in providing the Navigator Services as those terms are defined under the CCPA.

### 3. California Rights and Choices

Without being discriminated against for exercising these rights and subject to certain restrictions, if you are a California Consumer you have the right under California law to request that we:

- Provide you the categories of personal information we have collected or disclosed about you in the last twelve months; the categories of sources of such information; the business or commercial purpose for collecting, “selling,” or “sharing” your personal information; the categories of third parties to whom we disclose or “sell,” or with whom we “share,” personal information; and the categories of personal information we “sell” or “share.”
- Provide access to and/or a copy of certain information we hold about you.
- Correct inaccurate personal information about you.
- Delete certain information we have about you.

Because we designed the Navigator Services to limit the personal information received by Branch, Branch cannot associate the personal information collected via the Navigator Services with directly identifying personal information for a particular individual or household (such as a name or email address). The information we collect is also not held in a readily accessible and understandable format that is typically used by consumers. Thus, it is not currently reasonably possible for Branch to verify the identity of any particular consumer. We therefore can only comply with requests for the

categories of personal information we collect, but we cannot provide you with any specific pieces of information we may have collected about you or delete personal information we may have collected from you.

### **How to exercise your access, deletion, and correction rights**

Subject to restrictions under applicable law, California Consumers (or their agents, as described below) may exercise their California privacy rights by contacting us at [discoveryprivacy@branch.io](mailto:discoveryprivacy@branch.io), or at (650) 209-6461. We may deny your request as permitted by the CCPA. If we are unable to complete your request, we will provide you additional information about the reasons that we could not comply with your request.

### **Right to opt-out of the “sale” or “sharing” of your personal information**

Where applicable, the CCPA provides California Consumers the right to opt-out of the “sale” of personal information or “sharing” of personal information for “cross-context behavioral advertising”. Based on the definition of “sell” and “share” under the CCPA and under current regulatory guidance, as mentioned above, we do not believe we currently engage in such activity with respect to California Consumers. We do not have actual knowledge of any “sales” or “sharing” by us of personal information about California Consumers under 16 years of age.

### **Right to nondiscrimination**

We will not deny, charge different prices for, or provide a different level of quality of goods or services if you choose to exercise these rights.

### **Submitting CCPA Requests**

If you are a California Consumer, contact us at [discoveryprivacy@branch.io](mailto:discoveryprivacy@branch.io) with "CCPA request" in the subject line.

If you wish to designate an agent to make a request on your behalf, your agent should contact us at [discoveryprivacy@branch.io](mailto:discoveryprivacy@branch.io) with “CCPA Agent request” in the subject line. The request should include your name, your agent’s name, the nature of the request, and contact information that will permit us to verify your identity and your agent’s authority to submit the request directly with you.

## **4. Retention of Your Personal Information**

Please see the Our Data Retention Policy section of our Privacy Policy.

# Additional Information for Residents of Certain Other States

The Virginia Consumer Data Protection Act (“**VCDPA**”), Colorado Privacy Act (“**CPA**”), and Connecticut Data Privacy Act (“**CTDPA**”) provide certain rights to residents of the states of Virginia, Colorado, and Connecticut. This section of our Navigator Privacy Policy applies if you are a natural person who is a resident of Virginia, Colorado, or Connecticut and you use the Navigator Services. This notice supplements the information in our Navigator Privacy Policy. Certain terms used herein have the meanings given to them in the VCDPA, CPA, and CTDPA.

In addition to the rights described under “Your Rights” in our Navigator Privacy Policy, you can request that we:

- confirm we are processing your personal data; and
- opt you out of processing your personal data for online “targeted advertising.”

We do not currently use your personal data for targeted advertising as defined by the VCDPA, CPA, and CTDPA.

Certain information may be exempt from such requests under applicable law. Depending on where you live, if we deny your request to exercise your rights in whole or in part, you may have the right to appeal the decision. In such circumstances, you can contact us at [discoveryprivacy@branch.io](mailto:discoveryprivacy@branch.io) with the Subject “Data Privacy Request Appeal” to provide us with information about why you are appealing the decision.

Colorado residents may review [Sections 1 and 2](#) for additional details on how we process personal data about you.