

TransCor Privacy Notice for California Residents

POLICY

This **Privacy Notice for California Residents** supplements the information contained in Code of Ethics of TransCor America (hereafter “TransCor”) and applies solely to all visitors, users, 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 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 individual or device (“**personal information**”). In particular, we may have collected the following categories of personal information from individuals within the last twelve (12) months:

Category	Examples
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, agency identification number, Social Security number, 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)).	A 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. Some personal information included in this category may overlap with other categories.
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.
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
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.
F. Internet or other similar network activity.	Browsing history or search history.
G. Geolocation data.	Physical location or movements.
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.
I. Professional or employment-related information.	Current or past job history or performance evaluations.

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Category	Examples
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	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.
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Personal information does not include:

- Publicly available information from government records;
- Deidentified or aggregated consumer information;
- Information excluded from the CCPA's scope, like:
 - 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
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

TransCor obtains the categories of personal information listed above from the following categories of sources:

- Directly from you; and
- From our government partners.

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 you provided the information;
- To process your requests, employment applications, transactions, and payments and prevent transactional fraud;
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses;
- To help maintain the safety, security, and integrity of our services, databases and other technology assets, and business;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- As described to you when collecting your personal information or as otherwise set forth in the CCPA;
- To respond to government partner requests under our contracts; and
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of TransCor's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by TransCor about you is among the assets transferred.

TransCor 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

TransCor may disclose your personal information to a third party for a business purpose. When we disclose

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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:

- Service providers;
- Government partners; and
- Auditing entities.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, TransCor may have disclosed the following categories of personal information for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California or federal law.
- Category D: Commercial information.
- Category E: Biometric information.
- Category F: Internet or other similar network activity.
- Category G: Geolocation data.
- Category H: Sensory data.
- Category I: Professional or employment-related information.
- Category J: Non-public education information.
- Category K: Inferences drawn from other personal information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers;
- Government partners; and
- Entities with oversight responsibilities for each location.

Sales of Personal Information

In the preceding twelve (12) months, TransCor has not sold the following categories of personal information:

- A. Identifiers.
- B. California Customer Records personal information categories.
- C. Protected classification characteristics under California or federal law.
- D. Commercial information.
- E. Biometric information.
- F. Internet or other similar network activity.
- G. Geolocation data.
- H. Sensory data.
- I. Professional or employment-related information.
- J. Non-public education information.
- K. Inferences drawn from other personal information.

YOUR RIGHTS AND CHOICES

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.

Access to Specific Information and Data Portability Rights

You have the right to request that TransCor disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable

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request (per TransCor policies [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 that personal information;
- The categories of third parties with whom we share that personal information; and
- 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 TransCor delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable request (per TransCor policies [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:

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Exercise free speech, ensure the right of another individual 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 expectations based on your relationship with us;
- Comply with a legal or contractual obligation;
- Comply with requirements for applicable certifying and/or licensing entities; and
- 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 request to us by either:

- calling us at 1-800-825-3320; or
- visiting [TransCor.com/contact](https://www.transcor.com/contact).

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

You may only make a verifiable request for access or data portability twice within a twelve (12) month period. The verifiable 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 request does not require you to create an account with us. We will only use personal information provided in a verifiable request to verify the requestor's identity or authority to make the request.

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Response Timing and Format

We endeavor to respond to a verifiable request within forty-five (45) days of its receipt. If we require more time (up to ninety [90] days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the twelve (12) month period preceding the verifiable 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 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 Opt-Out and Opt-In Rights

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; and
 - Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
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CHANGES TO OUR PRIVACY NOTICE

TransCor 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 TransCor's 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 TransCor collects and uses your information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us:

Phone: 1-800-825-3320

Website: [TransCor.com/contact](https://www.transcor.com/contact)
