

U.S. STATE DATA PRIVACY LAWS NOTICE

Last Updated: October 24, 2023

OVERVIEW

This U.S. State Data Privacy Laws Notice (the “**Notice**”) supplements the information contained in ChurnZero’s [Global Privacy Policy](#) and applies solely to all visitors, users, and others who reside in the relevant U.S. states referenced herein. To learn more about ChurnZero’s privacy principles, visit our [Trust Center](#).

The California Consumer Privacy Act of 2018 (“**CCPA**”) became effective on January 1, 2020, and created a variety of privacy rights for California consumers. In November 2020, California amended the CCPA, effective January 1, 2023. Additional states have passed laws extending similar privacy rights to their consumers, including Virginia (effective January 1, 2023), Colorado (effective July 1, 2023), Connecticut (July 1, 2023), and Utah (December 31, 2023). We use this notice to make disclosures required by these state laws.

Please note that the rules implementing some of these laws have not yet been finalized. We are continuously working to better comply with these laws, and we will update our processes, disclosures, and this notice as these implementing rules are finalized.

This notice includes the following parts:

- **Transparency:** We are transparent about how your personal information is collected, used, disclosed, shared, and sold.
- **Control:** We put you in control of your personal information, including accessing, correcting, and deleting your personal information.
- **Benefits to You:** We use your personal information to benefit you and to make your experiences better.

TRANSPARENCY

What Personal Information We Collect and Use. You have the right to know what kinds of personal information ChurnZero collects, how we obtain and use that information, and our business purposes for that collection.

In the bulleted list below, we outline the categories of personal information we collect, the sources of the personal information, our purposes of processing, and the categories of recipients with whom we provide the personal information.

Please see the [Personal Data We Collect](#) and the [U.S. State Data Privacy](#) sections on our Privacy Policy for more information. Please see the [Data Retention](#) section of our Privacy Policy for information on personal data retention criteria.

We have collected the following categories of personal information from consumers within the last twelve (12) months:

Categories of Personal Information	Sources	Processing Purposes	Recipients
Identifiers (e.g., name, e-mail address, mailing address, and phone)	Interactions with you, organizations that represent end users (i.e., you), and other third parties (e.g.,	Provide our Products; respond to your requests; provide support and troubleshoot Product issues; authentication and	Service providers; affiliated companies; business

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number)	business partners).	security purposes; marketing; safety and compliance.	partners; user-directed entities.
Commercial Information (e.g., subscription records)	Interactions with you and organizations that represent end users (i.e., you).	Provide our Products; respond to your requests; provide support and troubleshoot Product issues; authentication and security purposes; marketing.	Service providers; affiliated companies; business partners; user-directed entities.
Internet or network information (e.g., browsing/search history)	You and your device	Provide our Products; respond to your requests; provide support and troubleshoot Product issues; Product improvement/development; authentication and security purposes; marketing; safety and compliance.	Service providers; affiliated companies; business partners; user-directed entities.
Geolocation Information (e.g., IP address; mobile IDs)	You and your device	Provide our Products; respond to your requests; provide support and troubleshoot Product issues; Product improvement/development; authentication and security purposes; marketing; safety and compliance.	Service providers; affiliated companies
Financial Information (e.g., payment information)	You and organizations that represent end users (i.e., you).	Transact commerce; authentication and security purposes.	Service providers; affiliated companies; business partners; user-directed entities.
Inferences	You and your device	Provide our Products; provide support and troubleshoot Product issues; Product improvement/development; authentication and security purposes; marketing; safety and compliance.	Service providers; affiliated companies.

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Other personal information (e.g., instances where you interact with us (support requests) through email, phone, or other support channels	You and your device	Provide our Products; respond to your requests; provide support and troubleshoot Product issues; Product improvement/development; authentication and security purposes; marketing; safety and compliance	Service providers; affiliated companies; business partners; user-directed entities.
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We do not anticipate collecting, processing, or disclosing certain personal information that qualifies as “sensitive data” under applicable U.S. state data privacy laws. Sensitive data is a subset of personal information. Where we do collect, process, or disclose sensitive personal information, we will do so based on your consent obtained considering your Products usage and settings.

How We Share Your Personal Information

You have the right to know if your personal information is provided to third parties. We may provide personal information to have our Service Providers, as defined by the CCPA, perform services specified by written contract. In addition, we may disclose personal information to third parties for other notified purposes, as permitted by U.S. state data privacy laws.

We make this information available to consumers in the [Reasons We Share Personal Data](#) and the [U.S. State Data Privacy](#) sections in our Policy.

"Sharing" and personalized ads. We may “share” your personal information with third parties for personalized advertising purposes, as defined under California and other applicable U.S. state laws. “Personalized advertising” in this context means advertisements we believe will be more interesting and useful to you based on your data, including your site visits. Third parties may use the data we have shared with them to show you personalized ads. For options that may be available to you to avoid the sharing of personal data, please see the [How to Access and Control Your Personal Data](#) section of our Policy.

We Do Not Sell Your Personal Information. You have the right to know whether your personal information is being sold. Your personal information is “sold” when it is provided with a third party for monetary or other valuable consideration for a purpose that is not a “business purpose” as set forth in the CCPA or other U.S. state data privacy laws. Please note a “sale” does not include when we disclose your personal information at your direction, or when otherwise permitted under law.

CONTROL

Right to Know, Right to Correct, Right to Receive, Right to Delete. You have the right to:

- **Know** what specific pieces of personal information ChurnZero has collected and retained about you over the previous 12 months.
- **Correct** inaccurate personal information ChurnZero may have retained.
- **Receive** a copy of your personal information.
- **Delete** your personal information.

ChurnZero makes it easy for you to exercise your rights. You can submit a request to our privacy support team via our [Trust Center](#) or call our U.S. toll free number (888) 258-4999. If

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you use an authorized agent, we provide your agent with guidance on how to exercise your privacy rights. We may ask you for more information to help us fulfill your request.

If you have made a request to ChurnZero to know, correct, receive, or delete your personal information and believe your request was denied by us, you can exercise your right to appeal the results of your request by contacting our privacy support team at privacy@churnzero.com. If your appeal is unsuccessful and depending upon the state where you live, you may have the right to raise a concern or lodge a complaint with your state attorney general.

Right to Limit Use of Sensitive Personal Information. We do not anticipate collecting, processing, or disclosing certain personal information that qualifies as “sensitive data” under applicable U.S. state data privacy laws.

You have the right to limit the use or disclosure of your sensitive data to the following types of activities, in accordance with applicable U.S. state data privacy laws:

- Perform the services or provide the goods you reasonably expect.
- Help ensure the security and integrity of our services, systems, and data, to combat malicious deceptive, fraudulent or illegal acts, and to protect the physical safety of individuals, to the extent the processing is reasonably necessary and proportionate.
- For short-term transient use (including non-personalized advertising), so long as the personal data is not disclosed to a third party, is not used for profiling, and is not used to alter an individual’s experience outside the current interaction with ChurnZero.
- Perform services on behalf of ChurnZero, such as maintaining accounts, providing customer service, processing, or fulfilling orders/transactions, verifying customer information, processing payments, providing financing, providing analytics, providing storage, and similar services.
- Undertake activities to verify or maintain the quality or safety of, or improve, upgrade, or enhance a service or device owned or controlled by ChurnZero.
- Collect or process sensitive data where the collection or processing is not for inferring characteristics about the individual.
- Any other activities in accordance with any future regulations that are issued pursuant to U.S. state data privacy laws.

We do not use or disclose your sensitive data for purposes other than those listed above, without your consent, or as permitted or required under applicable laws. So, we do not offer an ability to limit the use of sensitive data.

Right to Opt-out of “Sale” or “Sharing”. We do not sell your personal information, so we do not offer an opt out. We may “share” personal information with third parties for personalized advertising purposes. You may indicate your choice to opt-out of the sharing of your personal data with third parties for personalized advertising on third party sites by visiting our [Trust Center](#). Even if you turn off “sharing,” you may still see personalized ads based on information other companies and ad networks have collected about you, if you have not opted out of sharing with them.

Non-Discrimination. U.S. state privacy laws prohibit businesses from discriminating against you for exercising your rights under the law. Such discrimination may include denying a good or service, providing a different level or quality of service, or charging different prices. The CCPA permits businesses to provide differing levels or quality or different prices where the business can demonstrate that the difference is reasonably related to the value to the business of the consumer’s personal information.

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De-Identified Data. In some situations, ChurnZero may process de-identified data. Data is in this state when we are not able to link data to an individual to whom such data may relate without taking additional steps. In those instances, and unless allowed under applicable law, we will maintain such information in a de-identified state and will not try to re-identify the individual to whom the de-identified data relates.

Disclosures of personal data for business or commercial purposes. As indicated in the [Reasons We Share Personal Data](#) section, we share personal data with third parties for various business and commercial purposes. The primary business and commercial purposes for which we share personal data are the purposes of processing listed in the table above. However, we share all categories of personal data for the business and commercial purposes in the [Reasons We Share Personal Data](#) section.

ChurnZero as a Service Provider. When ChurnZero acts as a “service provider” (or similar term) under the CCPA or other U.S. data privacy law, we follow the instructions of the business that engaged us with respect to how we process your personal information. If you would like more information about how your personal information is processed by other companies, including companies that engage us as a service provider, please contact those companies directly.