

Political Action Campaign California Privacy Notice

Effective Date: January 1, 2023

This Political Action Campaign (“**Campaign**,” “**Company**,” “**us**,” “**we**,” or “**our**”) California Privacy Notice (“**Notice**”) is provided pursuant to the California Consumer Privacy Act, as amended (the “**CCPA**”). This Notice supplements the Campaign’s other privacy policies and notices, including our [Privacy Policy](#). In the event of a conflict between any other Company policy, statement, or notice and this Notice, this Notice will prevail as to California consumers and their rights under the CCPA.

This Notice does not apply to job applicants or current and former employees/contractors. If you are an employee or current or former employee/contractor, a separate privacy notice will be provided to you in the course of your employment. If you are an applicant, please review our California applicant privacy notice on ITG’s [Careers Page](#). If you have any questions, please contact us as provided below.

Unless otherwise noted, the disclosures herein cover our activities in the twelve (12) months preceding the Effective Date, as well as our current practices.

1. HOW AND WHY WE COLLECT, USE, AND DISCLOSE PERSONAL INFORMATION

“**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is publicly available, de-identified, aggregated, and the CCPA exempts certain additional categories of information from its purview, such as information subject to other laws and regulations. This Notice applies only to information governed by the CCPA.

We may collect, use, and disclose Personal Information and sensitive Personal Information for valid business purposes or in connection with threatened or pending litigation consistent with applicable laws as identified below. Where we disclose applicable Personal Information or sensitive Personal Information to recipients, such as our service providers, we do so for the same business purposes described below. These examples may vary depending on the nature of your interactions with us.

Category of Personal Information	Purposes for Collection, Use, and/or Disclosure	Categories of Recipients to Whom Personal Information is Disclosed for a Business Purpose
Identifiers , including real name, alias, account name, username, driver’s license number, signature, social security number, state identification number, postal address, unique personal identifier, online identifier, IP address, email address, or other similar identifiers	<ul style="list-style-type: none">• To allow you to participate in the features we offer• To maintain your accounts with us• To communicate with you, including about our products, updates to our terms and policies, and to obtain your feedback• To send you marketing materials and advertisements• To recognize you when you use our services	<ul style="list-style-type: none">• Service providers• Affiliates• Data analytics providers• Legal counsel and/or in connection with threatened or pending litigation and regulatory matters

Category of Personal Information	Purposes for Collection, Use, and/or Disclosure	Categories of Recipients to Whom Personal Information is Disclosed for a Business Purpose
	<ul style="list-style-type: none"> • To show you relevant ads while you browse the internet or use social media • To send you relevant coupons • To allow you to participate in promotions, sweepstakes, contests, and rewards programs • Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes • To detect and prevent fraud against you and/or us • For litigation and other legal and regulatory requirements 	
<p>Personal information described in Cal. Civ. Code § 1798.80(e), including name, address, telephone number, state identification card number, and bank account number, credit card number, debit card number, or other financial payment information</p> <p><i>Some Personal Information included in this category may overlap with other categories</i></p>	<ul style="list-style-type: none"> • To allow you to participate in the features we offer • To maintain your accounts with us • To communicate with you, including about our products, updates to our terms and policies, and to obtain your feedback • To send you marketing materials and advertisements • To recognize you when you use our services • To show you relevant ads while you browse the internet or use social media • To send you relevant coupons • To allow you to participate in promotions, sweepstakes, contests, and rewards programs • Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes • To detect and prevent fraud against you and/or us • For litigation and other legal and regulatory requirements 	<ul style="list-style-type: none"> • Service providers • Affiliates • Data analytics providers • Legal counsel and/or in connection with threatened or pending litigation and regulatory matters
<p>Characteristics of protected classifications under California or federal law, including age and date of birth, gender, languages spoken, marital status, and racial or ethnic origin</p>	<ul style="list-style-type: none"> • To allow you to participate in the features we offer • To send you relevant marketing materials and advertisements • To tailor our communications to you • To improve our services, and our products, marketing and advertising • Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes 	<ul style="list-style-type: none"> • Service providers • Affiliates • Data analytics providers • Legal counsel and/or in connection with threatened or pending litigation and regulatory matters

Category of Personal Information	Purposes for Collection, Use, and/or Disclosure	Categories of Recipients to Whom Personal Information is Disclosed for a Business Purpose
	<ul style="list-style-type: none"> • To detect and prevent fraud against you and/or us • For litigation and other legal and regulatory requirements 	
<p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</p>	<ul style="list-style-type: none"> • To allow you to participate in the features we offer • To provide you with appropriate products and recommendations • To help you find relevant products more quickly • To tailor our communications to you • To provide customer service and support • To send you relevant coupons • To allow you to participate in promotions, sweepstakes, contests, and rewards programs • To improve our services, and our products, marketing and advertising • Auditing, research and analysis, to maintain and improve the Service, and for any other internal business purposes • To detect and prevent fraud against you and/or us 	<ul style="list-style-type: none"> • Service providers • Affiliates • Data analytics providers
<p>Internet or other electronic network activity information, including Internet or other similar activity, browsing history, search history, information on a consumer's interaction with a website, application logs, device data and registration, social media account information or advertisement</p>	<ul style="list-style-type: none"> • To allow you to participate in the features we offer • To provide you with appropriate products and recommendations • To help you find relevant products more quickly • To tailor our communications to you • To provide customer service and support • To send you relevant coupons • To allow you to participate in promotions, sweepstakes, contests, and rewards programs • To improve our services, and our products, marketing and advertising • Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes • To detect and prevent fraud against you and/or us 	<ul style="list-style-type: none"> • Service providers • Affiliates • Data analytics providers
<p>Geolocation data</p>	<ul style="list-style-type: none"> • To allow you to participate in the features we offer • To deliver coupons to you 	<ul style="list-style-type: none"> • Service providers • Affiliates • Data analytics providers

Category of Personal Information	Purposes for Collection, Use, and/or Disclosure	Categories of Recipients to Whom Personal Information is Disclosed for a Business Purpose
	<ul style="list-style-type: none"> • Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes 	
<p>Audio, electronic, visual, thermal, olfactory, or similar information, including audio recordings of customer care calls, video, or similar information</p>	<ul style="list-style-type: none"> • To provide you with customer service • To improve our products and services • For litigation and other legal and regulatory requirements 	<ul style="list-style-type: none"> • Service providers • Affiliates • Data analytics providers • Legal counsel and/or in connection with threatened or pending litigation and regulatory matters
<p>Professional or employment-related information</p> <p><i>If you are a Company employee, please contact Human Resources for additional disclosures. Job applicants can find additional disclosures on ITG's Careers Page here.</i></p>	<ul style="list-style-type: none"> • For litigation and other legal and regulatory requirements 	<ul style="list-style-type: none"> • Legal counsel and/or in connection with threatened or pending litigation and regulatory matters
<p>Non-public education information, including school(s) attended and degrees obtained.</p>	<ul style="list-style-type: none"> • For litigation and other legal and regulatory requirements 	<ul style="list-style-type: none"> • Legal counsel and/or in connection with threatened or pending litigation and regulatory matters
<p>Inferences used to create a profile</p>	<ul style="list-style-type: none"> • To provide you with appropriate products and recommendations • To improve our services, and our products, marketing and advertising • To provide you with a better website or app experience • Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes • To detect and prevent fraud against you and/or us 	<ul style="list-style-type: none"> • Service providers • Affiliates • Data analytics providers
<p>Other Information, such as information that does not directly fit within one of the categories defined by the CCPA, including the contents of communications you send to us by phone, email, text, online chat, etc.</p>	<ul style="list-style-type: none"> • To communicate with you about our products and services, your orders, and to provide customer service and support • To improve our websites, apps, products, and marketing • To allow you to participate in our promotions, sweepstakes, contests, and loyalty programs • To detect and prevent fraud against you and/or us • For litigation and other legal and regulatory requirements 	<ul style="list-style-type: none"> • Service providers • Affiliates • Data analytics providers • Legal counsel and/or in connection with threatened or pending litigation and regulatory matters

Sensitive Personal Information

We may collect, use, and disclose sensitive Personal Information for business purposes consistent with applicable laws, as identified below. Where we transfer applicable sensitive Personal Information to recipients, such as our service providers, we do so for the same business purposes described below. These examples may vary depending on the nature of your interactions with us.

Category of Sensitive Personal Information	Business Purposes for Collection, Use, and Disclosure	Categories of Recipients to Whom Sensitive Personal Information is Disclosed for a Business Purpose
Personal Information that reveals a consumer's social security, driver's license, state identification card, or passport number	<ul style="list-style-type: none"> • To allow you to participate in the features we offer • To maintain your accounts with us • To communicate with you, including about our products, updates to our terms and policies, and to obtain your feedback • To send you marketing materials and advertisements • To recognize you when you use our services • To show you relevant ads while you browse the internet or use social media • To send you relevant coupons • To allow you to participate in promotions, sweepstakes, contests, and rewards programs • Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes • To detect and prevent fraud against you and/or us • For litigation and other legal and regulatory requirements 	<ul style="list-style-type: none"> • Service providers • Affiliates • Data analytics providers • Legal counsel and/or in connection with threatened or pending litigation and regulatory matters
Personal Information that reveals a consumer's race	<ul style="list-style-type: none"> • For product testing • For litigation and other legal and regulatory requirements 	<ul style="list-style-type: none"> • Service providers • Affiliates • Legal counsel and/or in connection with threatened or pending litigation and regulatory matters
Personal Information collected and analyzed concerning a consumer's health	<ul style="list-style-type: none"> • For litigation and other legal and regulatory requirements 	<ul style="list-style-type: none"> • Legal counsel and/or in connection with threatened or pending litigation and regulatory matters

Disclosing Your Personal Information

We may disclose each of the categories of Personal Information and sensitive Personal Information identified above to the respectively identified categories of recipients for operational

or business purposes consistent with the purposes for collection or use designated, as is reasonably necessary and proportionate to achieve those purposes, or for another purpose that is compatible with the context in which the Personal Information or sensitive Personal Information was collected including, but not limited to:

- Auditing related to ads;
- Helping to ensure security and integrity;
- Debugging, repairing, and improving functionality;
- Short-term, transient use;
- Performing services on our behalf;
- Providing advertising and marketing services, as applicable;
- Internal research for technological development; and
- Verifying quality and/or safety.

In addition to the other purposes for collection, use, and disclosure of Personal Information and sensitive Personal Information described in this Notice, we may collect, use, and disclose Personal Information and sensitive Personal Information as required by law, regulation or court order; to respond to governmental and/or law enforcement requests; to identify, contact or bring legal action against someone who may be causing injury to or interfering with our or others' rights or property; to support any actual or threatened claim, defense or declaration in a threatened or pending case or before any jurisdictional and/or administrative authority, arbitration or mediation panel; or in connection with disciplinary actions/investigations. Likewise, we may disclose Personal Information and sensitive Personal Information to other parties in connection with the sale, assignment, merger, or reorganization.

Sources of Personal Information

We may collect Personal Information and sensitive Personal Information from the following sources:

- **Directly from you.** For example, when you sign up to receive information from us, when you place an order, or any other time you submit Personal Information to us voluntarily.
- **Automatically when you use our website or mobile apps.** For example, we may collect your usage history when you use our websites, systems, and applications.
- **Other parties.** For example, we may receive Personal Information from service providers who provide us with IT services, advertising services, or help facilitate our sales.

Tracking Technologies

We may use tracking technologies, such as cookies, including tracking technologies managed by vendors or external parties.

Tracking technologies can generally be categorized as follows:

- **Necessary or essential.** These tracking technologies are used for core functionality, for example for security and to enforce your privacy preferences. Without these cookies, some functionality on our websites and apps may fail.
- **Functional or analytics.** These tracking technologies help to improve our websites and apps by allowing us to understand how they are used and how they perform. We may also use location-aware technologies for purposes such as verifying your location and delivering or restricting content based on your location.
- **Advertising.** These tracking technologies help personalize ads that are shown to you on our websites and apps. If enabled, these tracking technologies will allow other parties to engage in advertising based on your use of online services

We may use Google Analytics or other providers for analytics services. We may also implement Google Analytics Advertising Features such as remarketing with analytics and interest-based ads. We may use first-party cookies or other first-party identifiers as well as third-party cookies or other third-party identifiers to, e.g., deliver advertisements, measure your interests, and/or personalize content. For more information on how Google Analytics uses data collected through our services, visit <http://www.google.com/policies/privacy/partners>. To opt out of Google Analytics cookies, visit <https://tools.google.com/dlpage/gaoptout> or download the Google Analytics Opt-Out Browser Add-On.

Depending on your device settings, you may also opt out of certain interest-based advertising through the device's "Limit Ad Tracking" or equivalent feature. Refer to your device for more information on what this opt out affects. For instance, you can adjust or reset the advertising identifiers on your mobile device in the device settings. iOS users can visit Settings > Privacy > Advertising > Reset Advertising Identifier. Android users can visit Google settings > Ads > Reset advertising ID.

How Long We Keep Your Personal Information

The chart below shows how long we retain the categories of Personal Information and sensitive Personal Information we collect and maintain in the ordinary course of business. For each category, our retention period is determined by the purposes for which we use the information and any legal obligations that require us to retain it.

We generally retain the categories of Personal Information and sensitive Personal Information described below for as long as one of the following apply:

- Retention is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the Personal Information or sensitive Personal Information;
- Retention is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information or sensitive Personal Information was collected;
- Retention is reasonably required to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your Personal Information or sensitive Personal Information by applicable laws or regulations.

Where Personal Information or sensitive Personal Information is used for more than one purpose, it will be retained at least as long as the latest period provides. If collected, we may maintain Personal Information or sensitive Personal Information indefinitely according to legal or regulatory requirements, including applicable legal holds, or for data backup or recovery purposes.

Category of Personal Information or Sensitive Personal Information	Retention Period
<i>Personal Information</i>	
Identifiers	<p>Our records retention schedule prescribes minimum retention periods of this information for business, legal, or operational requirements, including:</p> <ul style="list-style-type: none"> • active period plus six (6) years for records related to the purchasing of products or services; • seven (7) years for records relating to accounting for money owed by customers; • indefinite retention for record information related to customer incentive payments; and • indefinite retention for applicable legal or regulatory holds.
Personal Information described in Cal. Civ. Code § 1798.80(e)	<p>Our records retention schedule prescribes minimum retention periods of this information for business, legal, or operational requirements, including:</p> <ul style="list-style-type: none"> • active period plus six (6) years for records related to the purchasing of products or services; • seven (7) years for records relating to accounting for money owed by customers; • indefinite retention for record information related to consumer demographics; and • indefinite retention for applicable legal or regulatory holds.
Characteristics of protected classifications	<p>Our records retention schedule prescribes retention periods of this information for business, legal, or operational requirements, including:</p> <ul style="list-style-type: none"> • indefinite retention for record information related to consumer demographics; and • indefinite retention for applicable legal or regulatory holds.
Commercial information	<p>Our records retention schedule prescribes minimum retention periods of this information for business, legal, or operational requirements, including:</p> <ul style="list-style-type: none"> • active period plus six (6) years for records related to the purchasing of products or services; • seven (7) years for records relating to accounting for money owed by customers; and • indefinite retention for record information related to customer incentive payments.
Internet or other electronic network activity information	<p>We do not generally maintain this type of Personal Information, and our record retention schedule does not prescribe a retention period for it.</p>
Geolocation data	<p>Our records retention schedule prescribes minimum retention periods of this information for business, legal, or operational requirements, including:</p> <ul style="list-style-type: none"> • seven (7) years for records relating to accounting for money owed by customers; and • indefinite retention for information related to select marketing material.
Audio, electronic, visual, thermal, olfactory, or similar information	<p>Our records retention schedule prescribes retention periods of this information for business, legal, or operational requirements, including:</p> <ul style="list-style-type: none"> • indefinite retention for record information related to consumer marketing activity; and • indefinite retention for applicable legal or regulatory holds.
Professional or employment-related information	<p>Our records retention schedule prescribes retention periods of this information for business, legal, or operational requirements, including:</p>

Category of Personal Information or Sensitive Personal Information	Retention Period
	<ul style="list-style-type: none"> • indefinite retention for record information related to consumer survey reports; and • indefinite retention for applicable legal or regulatory holds.
Non-Public education information	We do not generally maintain this type of Personal Information, and our records retention schedule does not prescribe a retention period for it.
Inferences	We do not generally maintain this type of Personal Information, and our records retention schedule does not prescribe a retention period for it.
Other Information	Our records retention schedule prescribes retention periods of this information for business, legal, or operational requirements, including: <ul style="list-style-type: none"> • indefinite retention for record information related to customer sales; and • indefinite retention for applicable legal or regulatory holds.
<i>Sensitive Personal Information</i>	
Social security, driver's license, state identification card, or passport number	Our records retention schedule prescribes minimum retention periods of this information for business, legal, or operational requirements, including: <ul style="list-style-type: none"> • active period plus six (6) years for records related to the purchasing of products or services; • seven (7) years for records relating to accounting for money owed by customers; and indefinite retention for record information related to consumer demographics; and • indefinite retention for applicable legal or regulatory holds.
Personal Information that reveals a consumer's race	Our records retention schedule prescribes retention periods of this information for business, legal, or operational requirements, including: <ul style="list-style-type: none"> • indefinite retention for record information related to consumer survey reports; and • indefinite retention for applicable legal or regulatory holds.
Personal Information collected and analyzed concerning a consumer's health	Our records retention schedule prescribes retention periods of this information for business, legal, or operational requirements, including: <ul style="list-style-type: none"> • indefinite retention for record information related to consumer survey reports; and • indefinite retention for applicable legal or regulatory holds.

Sharing and Selling Personal Information

We may sell or share the following categories of Personal Information with third parties for the purposes of cross-context behavioral advertising:

- Identifiers
- Internet or other electronic network activity
- Geolocation data

We sell and/or share this Personal Information with third parties for advertising purposes. The third parties to whom this Personal Information was sold and/or shared are advertisers and analytics vendors. When we use the terms sell, sold, or sale, we mean for valuable consideration and not monetary value.

We offer you the ability to opt out of sales and sharing of your Personal Information as set forth in the "Right to Opt Out of Sales and Sharing of Personal Information" section below.

We do not have actual knowledge that we sell or share the Personal Information of consumers under twenty-one (21) years of age.

Submitting Requests Relating to Your Personal Information

If you are a resident of California, you have the right to submit certain requests relating to your Personal Information as described below. **To submit a request**, please use our Consumer Rights Request [form](#) or call (888) 342-6567. Please note that, if you submit a request to know, request to delete or request to correct, you will be asked to provide two-to-three (2-3) pieces of Personal Information that we will match against our records to verify your identity. You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed. To submit a request as an authorized agent, please click [here](#).

Right to Know. You have the right to know what Personal Information we have collected about you, which includes:

1. The categories of Personal Information we have collected about you, including:
 - a. The categories of sources from which the Personal Information was collected;
 - b. Our business purposes or commercial for collecting, selling, or sharing Personal Information;
 - c. The categories of recipients to which we disclose Personal Information;
 - d. The categories of Personal Information that we sold, and for each category identified, the categories of third parties to which we sold that particular category of Personal Information
 - e. The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information.
2. The specific pieces of Personal Information we have collected about you.

Right to Delete Your Personal Information. You have the right to request that we delete Personal Information we collected from you, subject to certain exceptions.

Right to Correct Inaccurate Information. If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.

Right to Opt Out of Sales and Sharing of Personal Information. You have the right to opt out of the sale of your Personal Information, and to request that we do not share your Personal Information for cross-context behavioral advertising. To opt-out, please click [here](#).

If you choose to use the [Global Privacy Control](#) (“GPC”) browser signal, you will only be opted out of online sales or sharing of Personal Information, and will need to turn it on for each browser you use. To submit a request to opt out of offline sales and sharing which would not otherwise be controlled by GPC, please use our webform.

Right to Limit Use and Disclosure of Sensitive Personal Information. We do not use or disclose sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

Right to Non-Discrimination for the Exercise of Your Privacy Rights. If you choose to exercise any of your privacy rights under the CCPA, you also have the right not to receive discriminatory treatment by us.

2. CALIFORNIA “SHINE THE LIGHT”

Separate from your CCPA rights, you may obtain a list of the recipients to which we have disclosed Personal Information, as defined under California Civil Code Section 1798.83(e) (a/k/a the “Shine the Light Law”), during the preceding calendar year for direct marketing purposes, if applicable. To submit a request, please email us at privacy@itgbrands.com or send a letter to us at 714 Green Valley Road, Greensboro, NC 27408-7018 (Attn: Legal Department). Requests must include “California Privacy Rights Request” in the first line of the description, and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through the provided email address or mail address. Because these rights and your CCPA rights are not the same and exist under different laws, you must exercise your rights under each law separately.

3. HOW TO CONTACT US

For more information on your California privacy rights, please contact us [here](#), by mail to 714 Green Valley Road, Greensboro, NC 27408-7018 (Attn: Legal Department), or by phone at (888) 342-6567.