



## **California Consumer Privacy Act 2018 (“CCPA”) Privacy Notice:**

**Last Updated On: 22<sup>nd</sup> February 2022**

This privacy notice section for California residents supplements the information contained in our Privacy Policy and it applies solely to all visitors, users, and others who reside in the State of California.

We are subject to the California Consumer Privacy Act 2018 (“CCPA”) when we collect and use personal information about you and are responsible as a business or service provider for such personal information.

Keeping your Personal Information secure is our priority. Consistent with our responsibilities under CCPA, we maintain appropriate safeguards and security measures to protect your personal information.

### **1. Categories of Personal Information Collected**

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

- **Category A: Identifiers.**

Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers.

Collected: Yes.

- **Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).**

Examples: 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.

Collected: Yes.

- **Category C: Protected classification characteristics under California or federal law.**

Examples: 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).

Collected: No.

- **Category D: Commercial information.**

Examples: Records and history of products or services purchased or considered.

Collected: Yes.

- **Category E: Biometric information.**

Examples: Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, face prints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

Collected: No.

- **Category F: Internet or other similar network activity.**

Examples: Interaction with our Service or advertisement.

Collected: Yes.

- **Category G: Geolocation data.**

Examples: Approximate physical location.

Collected: No.

- **Category H: Sensory data.**

Examples: Audio, electronic, visual, thermal, olfactory, or similar information.

Collected: No.

- **Category I: Professional or employment-related information.**

Examples: Current or past job history or performance evaluations.

Collected: No.

- **Category 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)).**

Examples: 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.

Collected: No.

- **Category K: Inferences drawn from other personal information.**

Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Collected: No.

Under the CCPA, personal information does not include:

- Publicly available information from government records
- De-identified or aggregated consumer information
- Information excluded from the CCPA's scope, such as:
- 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
- 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

### **Sources of Personal Information**

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from the forms you complete on our Service, preferences you express or provide through our Service, or from your purchases on our Service.
- Indirectly from you. For example, from observing your activity on our Service.
- Automatically from you. For example, through cookies Mastek or our service providers set on your device when you navigate through our Service.

- From Service Providers. For example, third-party vendors to monitor and analyze the use of our Service, third-party vendors for payment processing, or other third-party vendors that we use to provide the Service to you.

### **Use of Personal Information for Business Purposes or Commercial Purposes**

We may use or disclose personal information we collect for "business purposes" or "commercial purposes" (as defined under the CCPA), which may include the following examples:

- To operate our Service and provide you with our Service.
- To provide you with support and to respond to your inquiries, for example to investigate and address your concerns and monitor and improve our Service.
- To fulfill or meet the reason you provided the information. For example, if you share your contact information to ask a question about our Service, 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 delivery.
- 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.
- For internal administrative and auditing purposes.
- To detect security incidents and protect against malicious, deceptive, fraudulent or illegal activity, including, when necessary, to prosecute those responsible for such activities.

Please note that the above examples provided are illustrative and not intended to be exhaustive.

If we decide to collect additional categories of personal information, then we will provide you notice by updating our Privacy Policy.

### **Do Not Sell My Personal Information**

As defined in the CCPA, "sell" and "sale" mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for valuable consideration. We do not sell any personal information.

### **Mobile Devices**

Your mobile device may give you the ability to opt out of the use of information about the apps you use in order to serve you ads that target your interests:

- "Opt out of Interest-Based Ads" or "Opt out of Ads Personalization" on Android devices
- "Limit Ad Tracking" on iOS devices

You can also stop the collection of location information from your mobile device by changing the preferences on your mobile device.

### **Links to Other Websites**

Our Service may contain links to other websites not operated by us. If you click on a third party link then you will be directed to a third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

### **Share of Personal Information**

We may share your personal information identified in the above categories with the following categories of third parties:

- Service Providers
- Payment processors
- Our affiliates
- Our business partners

Third party vendors to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

### **Data Privacy Rights under CCPA**

The CCPA provides California residents with specific rights regarding their personal information. If you are a resident of California, you have the following data privacy rights:

- **The right to notice.** You have the right to be notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.
- **The right to request.** Under CCPA, you have the right to request that we disclose information to you about our collection, use, sale, disclosure for business purposes and share of personal information. Once we receive and confirm your request, 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
  - We do not sell your personal data, however if in future we did sell your personal data for a business purpose for example sale of our company to another company, then we will disclose the following to you:

- The categories of personal information categories sold
  - The categories of personal information categories disclosed
- **The right to say no to the sale of Personal Data (opt-out).** You have the right to direct us to not sell your personal information. To submit an opt-out request, then please contact our legal team and our Data Protection Officer at [data.protection@mastek.com](mailto:data.protection@mastek.com)
- **The right to delete Personal Data.** You have the right to request the deletion of your Personal Data, subject to certain exceptions. Once we receive and confirm your request by emailing our legal team and our Data Protection Officer at [data.protection@mastek.com](mailto:data.protection@mastek.com), then 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 for example retaining the information is necessary for Mastek or our service providers 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.
  - 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.
  - 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.
- **The right not to be discriminated.** You have the right not to be discriminated against for exercising any of your consumer's rights under the CCPA, including by:
  - Denying goods or services to you
  - Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
  - Providing a different level or quality of goods or services to you
  - Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services

## **Exercising Your CCPA Data Protection Rights**

In order to exercise any of your rights under the CCPA, and if you are a California resident, you can contact us:

- By visiting this page on our website: [www.mastek.com](http://www.mastek.com)
- By sending our legal team and our Data Protection Officer an email at [data.protection@mastek.com](mailto:data.protection@mastek.com)

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.

Your request to us 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 the required information if we cannot:

- Verify your identity or authority to make the request
- And confirm that the personal information relates to you
- We will disclose and deliver the required information free of charge within 45 days of receiving your verifiable request. The time scale to provide the required information may be extended once by an additional 45 days when reasonably necessary and with prior notice.

Any disclosures we provide will only cover the 12-month period preceding the verifiable request's receipt.

For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

## **Changes to this Privacy Notice**

We may update our Privacy Notice from time to time. We will notify you of any changes by posting the new Privacy Notice on our website at [www.mastek.com](http://www.mastek.com).

## **Contact Us**

If you have any questions about this Privacy Notice, you can contact us:

- By visiting this page on our website at [www.mastek.com](http://www.mastek.com)
- By sending us an email to our legal team and our Data Protection Officer at [data.protection@mastek.com](mailto:data.protection@mastek.com)