

## Privacy Notice for California Residents

**Effective Date:** October 30, 2020

**Last Reviewed on:** October 30, 2020

This Notice supplements the information contained in WIS Privacy Policy, available at <https://www.sapinsideronline.com/privacy-policy/>, and applies solely to visitors, users, and others who reside in the State of California ("consumers" or "you") to comply with the California Consumer Privacy Act of 2018 ("CCPA"). Any terms defined in the CCPA have the same meaning when used in this Notice.

### 1. Information WIS Collects

As detailed in WIS' Privacy Policy, we collect different personal information from you depending on how you want to engage with WIS. In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	Name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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.	YES
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 (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
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.	NO

F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
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.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal information does not include:

- Publicly available information from government records.
- De-identified 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;
- 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.

To review how we obtain the categories of personal information listed above and to review what information we share, and with whom, read the “What information we collect about WIS Visitors (including attendees of our events)” and “Why your information is processed and how it will be used” sections of our [Privacy Policy](#). We will not collect additional categories or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## 2. Sharing Personal Information

We don't sell personal information in any jurisdiction. Members opt in to allow their data to be shared in exchange for content sponsored by the vendor.

We may disclose your personal information to third-parties for a variety of business purposes. In the preceding twelve (12) months, WIS has disclosed the following categories of personal information for a business purpose:

- Identifiers.
- California Customer Records personal information categories.
- Internet or other similar network activity.
- Geolocation data.
- Sensory data.

We may disclose your personal information to a third-party service providers for a business purpose. For more information on how we may share and disclosure your personal information, read the “*Who we may disclose your information to*” section of our [Privacy Policy](#).

WIS may also have disclosed your name, title, or business contact information to host venues (e.g., restaurant or hotel) or event sponsors of WIS marketing events in the twelve (12) months immediately preceding the posting of this CCPA Privacy Notice. If you would like to have your information excluded from this type of disclosure, you may submit a request to exercise your rights as detailed in the section entitled “*How To Exercise Your California Rights.*” WIS may have disclosed any of the above categories of personal information pursuant to an individual’s consent or under a written contract with a service provider for a business purpose in twelve (12) months immediately preceding the posting of this updated privacy policy.

### **3. Your Rights and Choices**

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

#### ***Your Right to Know and Receive Copies of Your Personal Information***

You have the right to know certain information about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer 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 (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:

- sales, identifying the personal information categories that each category of recipient purchased; and
- disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### ***Your Right to Request We Delete Your Personal Information***

You have the right to request that we delete any of your personal information that we collected from you and retained, unless retaining the information is necessary for us or our service provider(s) to:

1. 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, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. 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.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### ***How To Exercise Your California Rights***

To exercise your rights described above, please submit a verifiable consumer request to us by either:

- Calling us at +1 (781) 751-8646
- Emailing us at [customer@sapinsider.org](mailto:customer@sapinsider.org)
- Visiting <https://sapinsider.org>

- Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a twelve (12) months period. The verifiable consumer 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 consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

#### ***Response Timing and Format***

We endeavor to respond to a verifiable consumer request within forty-five (45) days of receiving the request. If we need more time (up to 90 days), we will tell you how much additional time we need and explain the reason in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the twelve (12) months period preceding our receipt of the verifiable consumer request. We do not charge a fee to process or respond to your verifiable consumer 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.

#### **4. Non-Discrimination**

We will not discriminate against you, deny you goods or services, charge you a different price, or provide you with a lesser quality of goods or services if you exercise any of your CCPA rights. Unless permitted by the CCPA.

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