

How Do We Protect Data of California Users

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from IPNovo, Inc. (together with our affiliates, “we,” “us,” “our”) us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with our website at <https://www.ipnovo.ai/>, or any website of us or our services (collectively, the “Services”), you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g., backups, etc.).

The California Code of Regulations defines a “resident” as:

- every individual who is in the State of California for other than a temporary or transitory purpose and
- every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose.

All other individuals are defined as “non-residents.”

If this definition of “resident” applies to you, we must adhere to certain rights and obligations regarding your personal information.

What Categories of Personal Information Do We Collect?

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples <i>(Please note that examples listed below are illustrative and may not apply to all users or all Services.)</i>	Collected (YES/NO)
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES
B. Personal information categories listed in the California Customer Records statute	Name, contact information, education, employment, employment history, and financial information	NO
C. Protected classification characteristics under California or federal law	Gender and date of birth	NO
D. Commercial information	Transaction information, purchase history, financial details, and payment information	YES
E. Biometric information	Fingerprints and voiceprints	NO

Category	Examples <i>(Please note that examples listed below are illustrative and may not apply to all users or all Services.)</i>	Collected (YES/NO)
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements	YES
G. Geolocation data	Device location	YES
H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	YES
J. Education Information	Student records and directory information	NO
K. Inferences drawn from other personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	YES

Category	Examples <i>(Please note that examples listed below are illustrative and may not apply to all users or all Services.)</i>	Collected (YES/NO)
L. Sensitive Personal Information	Government-issued identification numbers (such as Social Security, driver's license, state ID, or passport numbers); financial account credentials together with required access codes or passwords; precise geolocation; information revealing racial or ethnic origin, religious or philosophical beliefs, or union membership; genetic data; biometric information used for identification; health information; and information concerning sex life or sexual orientation.	NO

We will use and retain the collected personal information as needed to provide the Services or for:

- Category A - As long as the user has an account with us
- Category G - As long as the user has an account with us
- Category I - As long as the user has an account with us
- Category K - As long as the user has an account with us

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participating in customer surveys or contests; and
- Facilitating in the delivery of our Services and to respond to your inquiries.

How Do We Use and Share Your Personal Information?

More information about our data collection and sharing practices can be found in this privacy policy.

You may contact us via email at support@ipnovo.ai.

If you are using an authorized agent to exercise your right to opt out, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Will Your Information Be Shared with Anyone Else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on our behalf, following the same strict privacy protection obligations mandated by the California Consumer Privacy Act (the “CCPA”).

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be “selling” of your personal information.

We have not disclosed, sold, or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. We will not sell or share personal information in the future belonging to website visitors, users, and other consumers.

Your Rights with Respect to Your Personal Data.

(i) Right to request deletion of the data.

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.

(ii) Right to be informed.

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information we collect;
- the purposes for which the collected personal information;
- whether we sell or share personal information to third parties;

- the categories of personal information that we sold, shared, or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold, shared, or disclosed for a business purpose;
- the business or commercial purpose for collecting, selling, or sharing personal information; and
- the specific pieces of personal information we collected about you.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

(iii) Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights.

We will not discriminate against you if you exercise your privacy rights.

(iv) Right to Limit Use and Disclosure of Sensitive Personal Information.

We do not process consumer's sensitive personal information.

(v) Verification Process.

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

(vi) Other Privacy Rights.

- You may object to the processing of your personal information.
- You may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the information.
- You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.
- You may request to opt out from future selling or sharing of your personal information to third parties. Upon receiving an opt-out request, we will act upon the request as soon as feasibly possible, but no later than fifteen (15) days from the date of the request submission.

To exercise these rights, you can contact us via email at support@ipnovo.ai.