

POLICY: California Consumers Data Subject Rights Under the California Consumer Privacy Act (CCPA)			
Issued by: FlatironDragados	Approved by: Executive Committee	Approved Date: 3/2/2025	IT-P13

Categories of Personal Information Collected

We collect the following Personal Information:

Category	Examples	Reason for Collection
A. Identifiers	A real 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 other similar identifiers.	Contract administration. To activate and maintain client accounts. To fulfill requests for or respond to inquiries about our products or services. To provide offers and information to you (as permitted by law) about products, services, or events offered by us or that we think may be of interest to you for health and safety reasons. To facilitate the recruitment process-to fulfill employer responsibilities.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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.	Contract administration. To activate and maintain client accounts. To fulfill requests for or respond to inquiries about our products or services. To provide offers and information to you (as permitted by law) about products, services, or events offered by us or that we think may be of interest to you. To facilitate the recruitment process to fulfill employer responsibilities.
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).	To facilitate the recruitment process. To fulfill employer responsibilities.
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Contract administration.
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, temperature screening, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	For health and safety reasons and to meet client requirements.
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	To activate and maintain client accounts. To analyze how our websites are used and how they are performing to improve user experience, prevent fraud and abuse, and to de-bug
G. Geolocation data.	Physical location or movements.	For health and safety reasons.

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H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	For health and safety reasons.
I. Professional or employment-related information.	Current or past job history or performance evaluations.	To facilitate the recruitment process. To fulfill employer responsibilities.
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.	Not applicable
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	To provide offers and information to you (as permitted by law) about products, services, or events offered by us or that we think may be of interest to you. To facilitate the recruitment process. To fulfill employer responsibilities.

Sources from which Information Collected

We collect most of this Personal Information directly from you in person, by telephone, text, or email, and/or via our website and apps. However, we may also collect information:

- from publicly accessible sources (e.g., property records);
- directly from a third party, e.g., credit reporting agencies, or customer due diligence providers;
- from a third party with your consent (e.g., your bank);
- from cookies on our website; and
- via our IT systems, including automated monitoring of our websites and other technical systems, such as our computer networks and connections, communications systems, and email and instant messaging systems.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you with notice.

FlatironDragados shares your personal information for the following business purposes:

- Auditing for website performance.
- Detecting security incidents, protecting against malicious, deceptive, or fraudulent, or illegal activity
- Debugging to identify and fix errors.
- Performing services including maintaining or servicing accounts, providing or fulfilling services.
- Verifying and maintaining the quality or safety of a service or device controlled by FlatironDragados.

Your rights as a California resident:

Right to access

You have the right to know:

- Categories of information collected about you
- Categories of sources from which information is collected about you
- Business or commercial purpose for collecting or selling personal information

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- Categories of third parties with whom FlatironDragados shares data
- Specific pieces of information FlatironDragados has collected about you

Right to Deletion

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

We may not delete your Personal Information if it is necessary to:

- Complete the transaction
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech,
- Comply with an existing legal obligation; or
- Otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information.
- Protection Against Discrimination
- You have the right to not be discriminated against by us because you exercise any of your rights under the CCPA.

Protection Against Discrimination

You have the right to not be discriminated against by us because you exercise any of your rights under the CCPA.

Right to opt-out from the sale of personal information

FlatironDragados does not sell your personal information.

California Consumers: Consumer Rights Request

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either: Calling us at 303-485-4050; or Emailing us at privacy@fdcorp.com

Right to use an authorized agent

You have the right to use an authorized agent to submit a request to know or a request to delete on your behalf. If you are using an authorized agent to submit the opt-out request on their behalf, FlatironDragados may require that you:

- 1) Provide the authorized agent written permission to do so; and
- 2) Verify the agent's and your own identity directly with FlatironDragados.

Once we receive the request, we will determine whether your request is a valid verifiable consumer request. The 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; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Making a verifiable consumer request does not require you to create an account with us. 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 will respond to a CCPA request by following the procedures described in [How we will respond to your data subject rights request](#).

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