

US States Privacy Notice

Last Updated: May 29, 2024

Applicability

This disclosure explains how ACA-GPS, LLC (ACA-GPS or the Company) collects, uses and discloses personal information relating to applicable U.S. state privacy regulations including California residents covered by the California Consumer Privacy Act of 2018 (CCPA) and Consumer Rights Privacy Act of 2020 (CPRA), Colorado residents covered by the Colorado Privacy Act (CPA), Connecticut residents covered by the Connecticut Act Concerning Personal Data Privacy and Online Monitoring (CTDPA), and Utah residents covered by the Consumer Privacy Act (UCPA). We are providing this specific privacy notice to supplement the information and disclosures already contained in our [ACA-GPS Privacy Notice](#).

Introduction

Under the state regulations, “Personal Information” is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular resident. The specific Personal Information that we collect, use, and disclose relating to a resident covered by the applicable regulations will vary based on our relationship or interaction with that individual.

Keeping Personal Information secure is one of our most important priorities. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, electronic, procedural and organizational safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or by application service providers that we use to support our business.

Collection or Disclosure of Personal Information

The chart below outlines the categories (as defined by the California regulations) of Personal Information that we have collected or disclosed for a business purpose in the preceding twelve months. The examples of Personal Information provided for each category are taken from the California regulations and are included to help you understand what the categories mean. Other applicable states listed above may have different requirements, but the disclosure requirements are similar. The Personal Information that we actually collect or disclose is also listed in the last column of the table.

Category	Collect	Disclose	Actual data collected
A. Identifiers Examples: 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.	Yes	Yes	Name, email address, business address, telephone number, country, company, title, role, and past employers.

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<p>B. Categories of Personal Information in Cal. Civ. Code 1798.80(e)</p> <p>Examples: 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.</p>	Yes	Yes	Name, email address, business address, telephone number, country, company, title, and role.
<p>C. Characteristics of Protected Classifications under California or Federal Law</p> <p>Examples: Race or color, ancestry or national origin, religion or creed, age (over 40), mental or physical disability, sex (including gender and pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, gender identity or expression, medical condition, genetic information, marital status, military and veteran status.</p>	No	No	None
<p>D. Commercial Information</p> <p>Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	Yes	No	Services purchased
<p>E. Biometric Information</p> <p>Examples: Physiological, biological, or behavioral characteristics, including DNA, that can be used, singly or in combination with each other or with other identifying data, to establish individual identity, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information..</p>	No	No	None
<p>F. Internet or Other Electronic Network Activity Information</p> <p>Examples: Browsing history, search history, and information regarding a consumer's interaction with an internet website, application or advertisement.</p>	Yes	Yes	Information regarding a consumer's interaction with the ACA-GPS website and applications
<p>G. Geolocation Data</p> <p>Examples: Information that can be used to identify a precise physical location such as an IP address location of an internet-connected terminal or a GPS enabled mobile phone</p>	Yes	Yes	IP address location
<p>H. Sensory Information</p>	No	No	None

Category	Collect	Disclose	Actual data collected
Examples: Audio, electronic, visual, thermal, olfactory, or similar information.			
I. Professional or employment-related information Examples: Job application or resume information, past and current job history, and job performance information.	Yes	No	Job application or resume information, background reports, reference information, past and current job history, employment agreements, contractor agreements, confidentiality agreements and performance information. Name, email, role, postal address, country, telephone number, social security or national ID number, banking information and other information required for employment or contracted services and payment of those services.
J. Non-Public Education Information (as defined in 20 U.S.C. 1232g; 34 C.F.R. Part 99) Examples: Records that are directly related to a student maintained by an educational agency or institution or by a party acting for the agency or institution.	No	No	None
K. Inferences Drawn from Personal Information Examples: Consumer profiles reflecting a consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No	No	None

Categories of Sources of the Collection of Personal Information

In the preceding 12 months, we have collected Personal Information from general sources including you, your use of our services, your devices, our product vendors, and the media companies we use for promotions and campaigns. The categories of sources from whom we collected this Personal Information are:

- Directly from a resident or the individual's representatives
- The ACA-GPS website
- Public record sources (federal, state or local government sources).
- Commercial sources

Categories of Third Parties to Whom we Disclosed Personal Information and Business Purpose

The categories of third parties to whom we disclosed Personal Information for our business purposes described in this privacy disclosure are:

- Service providers who provide services such as website hosting, data analysis, web traffic analysis, information technology and related infrastructure, customer service, text

messaging or email delivery, auditing, marketing and marketing research activities, communication infrastructure and storage.

- Media companies and social media providers who promote the Company and products to customers and other prospective buyers.
- Third parties who provide services such as payment processing, banking, legal expertise, tax expertise, notaries and auditors.
- Government agencies as required by laws and regulations.
- Third parties in connection with a merger, sale, or asset transfer.
- Other third parties for whom we have obtained your permission to disclose your Personal Information.

Use of Personal Information

In the past 12 months, we have used Personal Information relating to applicable state residents to operate, manage, and maintain our business, to provide our products and services, and to accomplish our business purposes and objectives, including the following:

- Performing services, including maintaining or servicing accounts, providing customer service, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Short-term, transient use where the information is not disclosed to a third party and is not used to build a profile or otherwise alter an individual consumer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
- Debugging to identify and repair errors that impair existing intended functionality.
- Undertaking internal research for technological development and demonstration.
- Complying with laws and regulations and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions)

We may send ACA-GPS marketing information or newsletters to you. You may opt-out from the receipt of additional marketing or newsletter materials from the company at any time.

Sale of Personal Information

We do not sell or share your Personal Information. For purposes of this notice "sell, or share" means the disclosure of Personal Information to a third-party for monetary or other valuable consideration.

Your State Privacy Rights

If you are a resident of an applicable state, you have the right to:

- Request we disclose to you free of charge the following information covering the 12 months preceding your request:
 - the categories of Personal Information about you that we collected;

- the categories of sources from which the Personal Information was collected;
- the purpose for collecting Personal Information about you;
- the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
- the specific pieces of Personal Information we collected about you.
- Request we delete Personal Information we collected from you, unless the applicable state privacy requirements recognize an exception; and
- Be free from unlawful discrimination for exercising your rights.

We will acknowledge receipt of your request and advise you how long we expect it will take to respond if we are able to verify your identity. Requests for specific pieces of Personal Information may require additional information to verify your identity.

If you submit a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

In some instances, we may not be able to honor your request. For example, we will not honor your request if we cannot verify your identity or if we cannot verify that you have the authority to make a request on behalf of another individual. Additionally, we will not honor your request where an exception applies, such as information needed to support human resource requirements, payroll information, or where the disclosure of Personal Information would adversely affect the rights and freedoms of another consumer or where the Personal Information that we maintain about you is not subject to applicable state privacy access or deletion rights.

We will advise you in our response if we are not able to honor your request. We will not provide social security numbers, driver's license numbers or government issued identification numbers, financial account numbers, health care or medical identification numbers, account passwords or security questions and answers, or any specific pieces of information if the disclosure presents the possibility of unauthorized access that could result in identity theft or fraud or unreasonable risk to data or systems and network security.

We will work to process all verified requests within 45 days or within the time frames specified by the applicable state privacy regulations. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.

How to Exercise Your Rights

If you are a resident of an applicable state listed above, you may submit a request or contact us with questions or concerns about this Disclosure and our practices by:

- Writing us at: 6665 Scotland Circle, Cumming, GA, 30041 or emailing us at privacy@ACAGPS.com

Changes to US State Privacy Act Disclosure

We may change or update this Disclosure from time to time. When we do, we will post the revised Disclosure on this page with a new "Last Updated" date.