

Interim California Consumer Privacy Act (CCPA) Privacy Notice

Effective January 1, 2020

A new privacy law that provides California consumers certain rights regarding their personal information became effective on January 1, 2020. However, as of that date the California Attorney General had not completed the rule making process to establish the regulations for businesses to implement the law. Accordingly, we are delaying our full implementation of the law until we have definitive guidance from final regulations, and it will take some time following the date the regulations are final to implement them. In the meantime, we are providing you with notice of the personal information we collect and our purposes for that collection. In addition, if you are a California consumer and would like to register a request under your "right to know about personal information collected, disclosed or sold" (including right to obtain copies of specific pieces and/or information about categories of personal information practices), "right to request deletion of personal information" or "right to opt-out of the sale of personal information," you can contact us at compliance@soundpointcap.com and we will respond to your request as and when we have guidance on how to properly verify you and respond to your requests and are able to do so; however, be advised that these rights do not apply to personal information collected from (a) job applicants, current and former employees and independent contractors ("HR Data Subjects"), or (b) representatives of another business in connection with business communications or transactions ("B-to-B Data Subjects"). HR Data Subjects who are also California residents may learn more about our data collection practices by contacting their human resources department. We appreciate your patience.

We collect personal information (PI) from California consumers (but excluding B-to-B Data Subjects, who are not entitled to this notice) for the following purposes:

Category of PI	Examples	Purposes
1. Identifiers	This may include but is not limited to: name, postal address, Internet Protocol (IP) address, email address	This may include but is not limited to: managing interactions and transactions, performing services and operations and providing benefits, processing interactions, data security

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2. Personal Records	This may include but is not limited to: name, postal address, telephone number	This may include but is not limited to: managing interactions and transactions, performing services and operations and providing benefits, processing interactions, data security
3. Personal Characteristics and Traits	This may include but is not limited to: age	This may include but is not limited to: managing interactions and transactions
4. Commercial Information	This may include but is not limited to: products or services purchased, obtained or considered, or other purchasing or consuming histories or tendencies	This may include but is not limited to: managing interactions and transactions, performing services and operations and providing benefits, processing interactions, data security
5. Biometric Information	N/A	N/A
6. Internet Usage Information	This may include but is not limited to: browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement	This may include but is not limited to: managing interactions and transactions, performing services and operations and providing benefits, processing interactions, data security
7. Geolocation Data	N/A	N/A
8. Sensory Data	N/A	N/A
9. Professional or Employment Information	N/A	N/A
10. Non-public Education Records	N/A	N/A

Category of PI	Examples	Purposes
11. Inferences from PI Collected	This may include but is not limited to: inferences regarding a consumer's preferences, characteristics, psychological trends, predispositions, behavior, and attitudes	This may include but is not limited to: managing interactions and transactions, data security

We will revise this CCPA Privacy Notice from time-to-time as the law becomes more clear and we are able to provide you with better information on your CCPA rights and how to exercise them.

For additional information on our data practices, including cookies on our web site(s), see our privacy policy available at www.soundpointcap.com.