

## Bloomreach CCPA Compliance Policy

1. **Purpose.** Bloomreach takes its responsibilities for the privacy and security of consumers' personal information seriously. Bloomreach has established this California Consumer Privacy Act ("CCPA") Compliance Policy ("Policy") in furtherance of its commitment to compliance with all applicable laws and regulations.
2. **Scope.** This Policy applies to all data, transactions, and activities to the extent they are subject to the CCPA and to all personnel with job duties for or related to such data, transactions and activities.
3. **Definitions.** All definitions herein shall have the same meaning as in the CCPA, unless otherwise expressly stated. For avoidance of doubt, "Consumer" means any California resident, and "Personal Information" means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, as more fully defined in the CCPA.
4. **Protection of Personal Information.** Bloomreach has established reasonable security practices and procedures to help protect Personal Information. All personnel share in the responsibility to safeguard Personal Information in accordance with these practices and procedures.
5. **Collection and Use of Personal Information.**
  - a. Bloomreach will provide notice to Consumers and obtain Consumer consent as may be required by the CCPA, or as may be otherwise permitted by law.
  - b. Bloomreach will update its privacy notice to Consumers in accordance with the CCPA, prior to the collection of new categories of Personal Information and prior to the collection, use, retention, disclosure, or sale of Personal Information for new or different purposes.
  - c. Bloomreach will review and update its privacy notice to Consumers at least annually if necessary to comply with the CCPA.
  - d. To the extent the collection and use of Personal Information involved Personal Data of a BloomReach customer, we will collect, process and store such data only to do so in the performance of services and at the direction of such customer.
6. **Disclosure of Personal Information.** Bloomreach will ensure a lawful Business Purpose or other basis permitted by law for the disclosure of any Personal Information.
7. **Sale of Personal Information.** Bloomreach will honor a verified Consumer request to opt-out of the sale of that Consumer's Personal Information for at least twelve (12) months before requesting that the Consumer re-authorize the sale of Personal Information.
8. **Responses to Consumer Requests.**
  - a. Bloomreach will establish and maintain at least two request mechanisms, including but not limited to a toll-free telephone number and a dedicated website for Consumers to be able to make requests pursuant to the CCPA.

- b. Bloomreach will designate personnel responsible to routinely monitor for and respond to any received requests.
  - c. Bloomreach will ensure all website-based services and any applications directed to Consumers have a “Do Not Sell My Information” link.
  - d. Bloomreach will establish and maintain a program to ensure all personnel responsible for our response to Consumer inquiries under the CCPA, including inquiries regarding the Personal Information of children under the age of 16, are informed of the CCPA’s requirements.
  - e. Bloomreach will establish and maintain a procedure to review, analyze, verify, and authenticate Consumer requests and respond to such requests, including for access, deletion, sale opt-out, and sale opt-in, in accordance with the CCPA.
  - f. In no event will Bloomreach use Personal Information provided by a Consumer as part of a request pursuant to the CCPA for any purpose other than reviewing and responding to such request.
  - g. To the extent a Consumer inquiry involved Personal Data of a BloomReach customer, we will cooperate with such customer in fulfilling its obligations under the CCPA.
9. **Financial Incentives.** Bloomreach does not offer financial incentives to Consumers for the collection of Personal Information, the sale of Personal Information, or the deletion of Personal Information.
10. **Non-Discrimination.** Except as permitted by the CCPA and in accordance with any program of financial incentives established by Bloomreach, if any, Bloomreach will not discriminate against a Consumer because the Consumer exercised any rights under the CCPA by denying goods or services to the Consumer; charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing a different level or quality of goods or services to the Consumer; or suggesting that the Consumer will receive a different price or rate for goods or services or a different level or quality of goods or services.
11. **Questions.** For questions regarding this Policy, please contact Bloomreach’s General Counsel at [privacy@bloomreach.com](mailto:privacy@bloomreach.com).