

Bloomreach CCPA Consumer Rights Policy

1. SCOPE & OBJECTIVES

This CCPA Consumer Rights Policy describes how Bloomreach will manage requests from Consumers regarding their rights under the CCPA (collectively, “**Requests**”). These rights include a Consumer’s right to request access to their Personal Information compiled within the last twelve months; request that their Personal Information be deleted; and request that their Personal Information not be sold.

2. DEFINITIONS

“**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.

“**Consumer**” means the natural person, who is a resident of California, to whom the Personal Information relates.

3. REQUEST MANAGEMENT

- A. **Receipt.** Consumer Requests will typically be received by Bloomreach through www.bloomreach.com or 888-263-3917. Requests received from Consumers through other means, where reasonably identified by Bloomreach, should be forwarded promptly by e-mail to privacy@bloomreach.com.
- B. **Logging.** Bloomreach will log the receipt and disposition of each Request, regardless of how received.
- C. **Verification.** Where Consumer does not provide sufficient information in the initial Request for Bloomreach to reasonably verify: (i) the identity of the Consumer, (ii) that the Consumer is a California resident, and (iii) the nature of the information within the scope of the Request, Bloomreach may seek additional information or clarification from Consumer through reasonable means, for example, by requesting that Consumer log into an account to confirm the request or present a valid government ID. Where Bloomreach is not able to reasonably verify the identity of the Consumer, California residency, and the information within the scope of the Request, Bloomreach will maintain a log of the Request, but take no further action with respect to that Request.
- D. **Assessment.** After verification of a Request, Bloomreach will assess the merit of the Request.
 - a. If Bloomreach concludes that the Request does not need to be granted for reasons permitted by the CCPA, then Bloomreach will reject the Request, as appropriate, including the reasons for doing so in the response to the Consumer.
 - b. If Bloomreach concludes that the Request be granted, in whole or in part, Bloomreach will draft a response to the Consumer and internally direct such action as may be appropriate to that particular Request (e.g., compile the Personal Information, flag Personal Information as not for sale, the delete Personal Information, etc.).

- c. Bloomreach shall determine whether service providers may have Personal Information within the scope of the Consumer's Request; if so, Bloomreach will also draft a notice of such Request to those entities.
 - d. Bloomreach shall determine whether it may have Personal Information of its customers within the scope of the Consumer's Request; if so, Bloomreach will promptly notify such customer and cooperate with such customer to satisfy its obligations with respect to its Personal Data that Bloomreach may collect or process on its behalf.
- E. Response.** After assessment of a Request, our responses to the Consumer, service providers, or third parties (if any) will normally be sent within forty-five (45) days from the date of our verification of the Request, which may be extended by up to 90 additional days by Bloomreach where necessary, taking into account the complexity and number of the requests. Bloomreach shall inform the Consumer of any such extension within 45 days of receipt of the Request, together with the reasons for the delay. If Requests from a Consumer are manifestly unfounded or excessive, in particular because of their repetitive character, Bloomreach may either charge a reasonable fee, taking into account the administrative costs of providing the information or communication or taking the action requested, or refuse to act on the Request and notify the Consumer of the reason for refusing the Request. Bloomreach shall demonstrate that any verified Consumer Request is manifestly unfounded or excessive before taking such action. Our responses will be sent by reasonable means, such as to the Consumer account email on file, with any Personal Information responsive to the Request contained in a password-protected ZIP file with password to be transmitted separately.

4. QUESTIONS

If you have any questions regarding this CCPA Consumer Rights Policy, please contact Bloomreach's General Counsel at privacy@bloomreach.com.