

# PARLER LLC Privacy Policy for California Residents

**Effective Date:** 18 December 2020

**Last Updated:** 18 December 2020

This **Privacy Policy for California Residents** supplements the information contained in Parler LLC's ("we" or "us") Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Policy.

## Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope.

In particular, we collected the following categories of personal information from consumers within the last twelve (12) months:

<b>Category</b>	<b>Examples</b>	<b>Collected</b>
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.	Yes
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.	Yes
C. Protected classification	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed,	Only if you choose to provide it in the

characteristics under California or federal law.	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).	verification process or in user-generated content (such as uploading an image or video sharing this information, or including in a bio), but this information is not analyzed.
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Only records of (1) device type used in connection with your account, and (2) purchases of ads on Parler (if applicable)
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, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	Only if you choose to provide it in user-generated content (such as uploading an image or video sharing this information, or including in a bio), but the information is not analyzed.
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Only in aggregate form as numbers of requests made to the system generally. No specific data as to type of request is collected.
G. Geolocation data.	Physical location or movements including e.g. IP address information.	Only coarse location data inferred from IP. Exact location collected only if this option is chosen when configuring or searching for a "Den."
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	Only if using phone to take photo with the app as part of

		user-generated content.
I. Professional or employment-related information.	Current or past job history or performance evaluations.	Only if you choose to provide it in user-generated content, for example a Parley, your profile bio, or display name. But this information is not analyzed.
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.	Only if you choose to provide it in user-generated content, for example a Parley, your profile bio, or display name. But this information is not analyzed.
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from information automatically generated (e.g., device type or IP address) as a result of your actions on our Website or mobile apps.

**Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, we use the information about who you follow on Parler to deliver you a feed of posts (“Parleys”) posted by those accounts; we use the information you put into a Parley to display it to those who follow you, follow users who echo your Parley or who visit your profile on Parler.
- To provide, support, personalize, and develop our Website, products, user experiences, and services.
- To create, maintain, customize, and secure your account with us.

- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our consumers is among the assets transferred.

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 notice.

### **Sharing Personal Information**

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, Company has disclosed personal information for a business purpose to the categories of third parties indicated in the chart below.

We do not sell personal information. For more on your personal information sale rights, see Personal Information Sales Opt-Out and Opt-In Rights.

<b>Personal Information Category</b>	<b>Category of Third-Party Recipients</b>	
	<b>Business Purpose Disclosures</b>	<b>Sales</b>
A: Identifiers.	Service and professional services providers	None
B: California Customer Records personal information categories.	Service and professional services providers	None
C: Protected classification characteristics under California or federal law.	Service and professional services providers	None
D: Commercial information.	Service and professional services providers	None
E: Biometric information.	Service and professional services providers.	None
F: Internet or other similar network activity.	Service and professional services providers.	None
G: Geolocation data.	Service and professional services providers.	None
H: Sensory data.	Service and professional services providers	None
I: Professional or employment-related information.	Service and professional service providers.	None
J: Non-public education information.	Service and professional services providers.	None
K: Inferences drawn from other personal information.	N/A	None

### ***Reselling Personal Information***

The CCPA prohibits a third party from reselling personal information unless you have received explicit notice and an opportunity to opt-out of further sales. We do not sell your personal information to third parties. If this policy changes you will be given explicit notice and an opportunity to opt-out of further sales, with details of how to exercise that opt-out right to be listed in this policy.

### **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

#### ***Right to Know and Data Portability***

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity (see [Exercising Your Rights to Know or Delete](#)), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

#### ***Right to Delete***

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 (the "right to delete"). Once we receive your request and confirm your identity (see [Exercising Your Rights to Know or Delete](#)), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or

product recall conducted in accordance with federal law, or otherwise perform our contract with you.

2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
6. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
7. Comply with a legal obligation.
8. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

We do not provide these deletion rights for B2B personal information.

### ***Exercising Your Rights to Know or Delete***

To exercise your rights to know or delete described above, please submit a request by either:

- Submitting a request via our online contact portal at <https://company.parler.com/ccpa-requests>
- Emailing us at [privacy@parler.com](mailto:privacy@parler.com).

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information by submitting proof of identity and of their authority to act. You may also make a request to know or delete on behalf of your child by providing proof of identity.

You may only submit a request to know twice within a 12-month period. Your request to know or delete must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, as well as describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know or delete. We will use personal information provided in the request only to verify the requestor's identity or authority to make it.

For instructions on exercising your sale opt-out or opt-in rights, see [Personal Information Sales Opt-Out and Opt-In Rights](#).

### ***Response Timing and Format***

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact us at [privacy@parler.com](mailto:privacy@parler.com).

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account, or to the email address associated with the account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will cover only the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### ***Personal Information Sales Opt-Out and Opt-In Rights***

If you are age 16 or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of any consumer, including consumers we actually know are less than 16 years old, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 15 years old, or the parent or guardian of a consumer less than 13 years old. Consumers who opt-in to personal information sales may opt-out of future sales at any time. If this policy changes at any time in future, we will obtain your consent before doing so and will provide an opportunity to opt-out of such sales.

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

**CCPA Rights Request Metrics**

Metrics regarding the consumer rights requests we received from California residents from January 1, 2020 to December 31, 2020 appear in the following chart:

<b>Request Type</b>	<b>Received</b>	<b>Granted (in whole or in part)</b>	<b>Denied</b>	<b>Mean Days to Respond</b>
Requests to Know	0	0	0	N/A
Requests to Delete	0	0	0	Not applicable

**Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not disclose personal information to third parties for direct marketing purposes. If you wish to make such a request, please send an email to [privacy@parler.com](mailto:privacy@parler.com) or write to

Parler Data Privacy  
 209 S Stephanie Street  
 B135  
 Henderson, NV 89012

**Changes to Our Privacy Policy**

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

**Contact Information**

If you have any questions or comments about this notice, the ways in which Parler, LLC collects and uses your information described here and in the **Privacy Policy**, your choices and rights

regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Website:** <https://company.parler.com/ccpa-requests>

**Email:** [privacy@parler.com](mailto:privacy@parler.com)

**Mail:**

Parler Data Privacy  
209 S Stephanie Street  
B135  
Henderson, NV 89012

If you need to access this Policy in an alternative format due to having a disability, please contact [privacy@parler.com](mailto:privacy@parler.com)