



California Consumer Privacy Act Notice

Last updated August 11, 2021

Legal Entities

WeFi Technology Holdings International LLC has affiliated entities and subsidiaries operating in the United States and around the world, including the group parent in the United States, WeFi Technology Group International LLC, WeFi Technology Group LLC, WeFi Technology Group Direct International, LLC, WeFi Technology Group Direct, LLC, and WeFi LATAM LLC (“Affiliated Entities”); (the “WeFi Technology Group” means WeFi Technology Holdings International LLC and our Affiliated Entities).

Applicability

Your privacy is important to us. This California Consumer Privacy Act Notice explains how the legal entities listed above (“Company,” “we,” or “us”) collect, use, and disclose personal information relating to **California residents** covered by the California Consumer Privacy Act of 2018 (“CCPA”). This Notice is provided pursuant to the CCPA.

Introduction

Under the CCPA, ‘**Personal Information**’ is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident. The CCPA, however, does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act (“GLBA”).

The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA 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 elsewhere.

Collection and Disclosure of Personal Information

In the past 12 months, we have collected, and disclosed to third parties for our business purposes, the following categories of Personal Information relating to California residents covered by this Notice:



- Identifiers, such as name and government-issued identifier (e.g., Social Security number);
- Personal information, as defined in the California safeguards law, such as contact information and financial information;
- Characteristics of protected classifications under California or federal law, such as sex and marital status;
- Commercial information, such as transaction information and purchase history;
- Internet or network activity information, such as browsing history and interactions with our website;
- Geolocation data, such as device location and Internet Protocol (IP) location;
- Audio, electronic, visual and similar information, such as call and video recordings;
- Professional or employment-related information, such as work history and prior employer; and
- Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics.

The categories of sources from whom we collected this Personal Information are:

- Directly from a California resident or the individual's representatives;
- Service Providers and other third parties;
- Public Record Sources (Federal, State or Local Government Sources)
- Information from our Affiliates;
- Website/Mobile App Activity/Social Media;
- Information from Client Directed Third Parties or Institutions representing a Client/Prospect; and
- Information from Corporate Clients about individuals associated with the Clients (e.g., an employee or board member).

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

- Affiliates and Subsidiaries of WeFi Technology
- Vendors and Service Providers who provide services such as website hosting, data analysis, payment processing, order fulfillment, information technology and



related infrastructure, customer service, email delivery, auditing, marketing and marketing research activities,

- Partners and Third Parties who provide services such as payment, banking and communication infrastructure, storage, legal expertise, tax expertise, notaries and auditors, who promote the bank and its financial services and products to customers and other prospective buyers,
- Other Third Parties who enable customers to conduct transactions online and via mobile devices, support mortgage and fulfillment services, and
- Government Agencies as required by laws and regulations.

Use of Personal Information

In the past 12 months, we have used Personal Information relating to California 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 or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, 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.
- Auditing related to a current interaction and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Undertaking activities to verify or maintain the quality or safety of a service controlled by us, and to improve, upgrade, or enhance the service controlled by the business.
- 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)

Sale of Personal Information



In the past 12 months, we have not “sold” Personal Information subject to the CCPA, including Personal Information of minors under the age of 16. For purposes of this Notice, “sold” means the disclosure of Personal Information to a third-party for monetary or other valuable consideration.

Rights under the CCPA

If you are a California resident, you have the right to:

1. Request we disclose to you free of charge the following information covering the 12 months preceding your request:
 - a. the categories of Personal Information about you that we collected;
 - b. the categories of sources from which the Personal Information was collected;
 - c. the purpose for collecting Personal Information about you;
 - d. 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
 - e. the specific pieces of Personal Information we collected about you;
2. Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception; and
3. Be free from unlawful discrimination for exercising your rights under the CCPA

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 will require additional information to verify your identity.

For individuals submitting a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom the request is made.

For a company or organization submitting a request on behalf of another person, we may require proof of authorization from the individual such as a Power of Attorney and verification of identity directly from the person for whom the request is made.

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 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 the CCPA's 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 pursuant to the CCPA. 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 California resident, you may submit a request by:

1. Completing a [Personal Information Request Form](#) (maintained on the WeFi Technology Group privacy page at www.wefitec.com/privacy-security).
2. Calling 720/750-6577.

Questions or Concerns

You may contact us with questions or concerns about this Notice and our practices by:

1. Writing us at:
Individual Rights Operations
5299 DTC Blvd., Suite 720
Greenwood Village, CO 80111
2. Emailing us at operations@wefitec.com.

Changes to This California Consumer Privacy Act Notice

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