

## California Consumer Protection Act (CCPA) Privacy Notice

PCT International, Inc. (PCT) does not sell your personal information.

**Exercising your CCPA rights.** The CCPA provides California residents with specific rights regarding their personal information. This section describes those rights and how to exercise those rights.

1. **Your CCPA rights:** You have the right to request that PCT disclose certain information to you about our collection and use of your personal information over the past 12 months.

If we receive from you a consumer request and confirm your request as required by the CCPA, we will disclose to you:

- The categories of personal information we collect about you.
- The categories showing the sources for the personal information we collect about you (also called a data portability request).
- Our business purpose for collecting that information.
- The categories of third parties we share that information with.
- The specific pieces of information we collected about you.

2. **Exercising your CCPA rights.** To exercise the access, data portability and deletion rights under the CCPA, please submit a verifiable consumer request to us by either:

- Calling us at 1-800-549-7055
- Emailing us at [privacyacts@pctintl.com](mailto:privacyacts@pctintl.com)

Only you or a person registered with the California Secretary of State that you have authorized to act on your behalf may make a verifiable consumer request. You may make a verifiable consumer request on behalf of your minor child. You may make a verifiable consumer request for access or data portability only twice with any 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative.
- 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 that the personal information relates to you.
- We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### Deletion Request Rights

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. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers 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, 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. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided by law.
4. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
5. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
6. Comply with a legal obligation.
7. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 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. 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 only cover the 12-month period preceding the verifiable consumer request's receipt. 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.

**Non-Discrimination.** PCT International, Inc. will not discriminate against you for exercising any of your rights under the CCPA. Unless otherwise permitted by the CCPA or applicable law, PCT will not:

- Deny you goods or services for making a CCPA
- Charge you different prices or rates for goods or services; or suggest that you might receive a different price or service for making a CCPA request.
- Provide you with a different quality of goods or service due to your CCPA request.

**Information collected by PCT.** The following are categories of information collected by PCT:

- Identifiers. We collect and store from our contacts names, addresses, email addresses, IP addresses, account names, job titles and other similar identifiers.
- Commercial information. We collect and store records of goods ordered and purchased, including purchase histories and forecasts.
- Usage. The information is used only for PCT's business purposes.
- Geolocation data. Data is stored on PCT's servers located in Maricopa County, Arizona and/or at the physical location of any recipient.

**Sources of Personal Information:**

- Emails received.
- Orders, forecasts and other commercial information received.
- Publicly available on-line information such as company websites, LinkedIn and other similar public data bases.

**How PCT uses personal information:**

- To fulfill or meet the reason the information was provided to us. For example, if you provide personal information such as phone number and email address in order to obtain a price quote, delivery schedule or other commercial information, your information will be used to fulfill that request.
- To maintain business records kept in the normal course of business, including keeping accurate records of customer accounts.
- To process transactions.
- To provide customer support and respond to inquiries.

**Sale of Personal Information:** In the past 12 months, PCT International, Inc. has not sold personal information.

**Personal information disclosed for business purposes in the past 12 months.** In the past 12 months, PCT may have disclosed personal information for the following purposes:

- Fulfillment of business purpose. Personal information may have been supplied to customers, vendors or other third parties to facilitate the business purpose for which the information was provided. This includes but is not limited to customer service, processing transactions and marketing.
- Auditing for legal or regulatory compliance.
- Security – to protect against fraud or other breach.
- Internal research