



## UNITED STATES REGIONAL PRIVACY NOTICE

***Last updated and effective date: December 1, 2023***

This United States Regional Privacy Notice (“**Privacy Notice**”) is for people living in the United States and supplements the information contained in the [Aras Privacy Policy](#). This Privacy Notice explains how Aras Corporation and its subsidiaries and affiliated companies (“**Aras**,” “**we**,” or “**us**”) collect, use and disclose your Personal Data. It also describes how to exercise your rights under the **California Consumer Privacy Act (“CCPA”)**, and other U.S. state laws applicable to consumers in their jurisdiction (collectively, the “**U.S. Privacy Laws**”).

For purposes of this Privacy Notice, “**Personal Data**” or “**personal information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household in the states subject to the U.S. Privacy Laws. This Privacy Policy does not apply to publicly available information lawfully made available by state or federal government records, deidentified information, aggregate consumer information, or other personal information that is exempt under applicable U.S. Privacy Laws. U.S. Privacy Laws may not apply in some jurisdictions to Personal Data of individuals acting in a commercial or employment context, such as a job applicant. **We strongly encourage you to read this Privacy Notice in its entirety.**

While our collection, use and disclosure of personal information varies based upon our relationship and interactions with you, in this Privacy Notice we describe, generally, how we have collected and disclosed personal information about California residents in the prior 12 months (from the Last Updated date above), and the rights California residents have under the CCPA regarding this personal information.

### **Rights Concerning Personal Data**

Depending on where you live and subject to certain exceptions, you may have the following rights concerning collection, use, sharing and deletion of Personal Data:

- **Right to Know.** You have the right to request information about the categories of Personal Data we have collected about you, the categories of sources from which we collected the Personal Data, the purposes for collecting, selling, or sharing the Personal Data, and the categories of third parties with whom we have shared, sold, or disclosed your Personal Data, as well as the specific pieces of Personal Data we have collected about you.
- **Right to Delete.** You have the right to request that we delete Personal Data that we have collected from you.
- **Right to Opt-Out of Sale or Sharing.** You may request that businesses stop selling or sharing your personal information (“opt-out”). We do not sell or share your Personal Data.
- **Right to Non-Discrimination.** We will not discriminate against those California residents who choose to exercise their CCPA rights.
- **Right to Correct.** You have the right to request that we correct inaccurate Personal Data that we have about you.
- **Right to Limit.** You have the right to limit the use and disclosure of sensitive personal information (e.g., your social security number, financial account information, your precise geolocation data, or your genetic data) collected about you. We do not request or maintain sensitive personal information.



You may exercise these rights by contacting us at [privacy@aras.com](mailto:privacy@aras.com).

**Verification:** In order to process rights requests, we may need to obtain information to locate you in our records or verify your identity depending on the nature of the request. In most cases, we will collect some or all of the following data elements: first and last name, email address, and telephone number. In some cases, we may request different or additional information, including a signed declaration that you are who you say you are. We will inform you if we need such information.

**Authorized Agents:** Authorized agents may exercise rights on behalf of you by submitting a request by contacting us at [privacy@aras.com](mailto:privacy@aras.com). Any person acting as an authorized agent on behalf of another person must indicate so when submitting a request. We may require the authorized agent to demonstrate authority to act on your behalf by providing signed permission from you. We may also require you to verify your own identity directly with us or to directly confirm with us that you provided the authorized agent permission to submit the request.

**Timing:** We will respond to requests within 45 days unless we need more time, in which case we will notify you and may take up to 90 days total to respond to your request.

**Categories of personal information that we collect and disclose**

The table below identifies the categories of personal information (as defined by the CCPA) that we have collected about California consumers in the prior 12 months, as well as how we have disclosed such information for a business purpose (subject to our applicable legal and ethical obligations).

Personal Information Collected		Disclosed for business purposes	
Category	Description	Yes / No	Categories of Third Parties
Identifiers	Includes direct identifiers such as a name, alias, address, email address, user ID, IP address and other online identifiers and other similar identifiers	Yes	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service Providers</li> <li>• Professional consultants</li> <li>• For legal, security and safety purposes</li> <li>• Judicial and quasi-judicial bodies</li> <li>• Regulatory and government entities</li> </ul>
Personal Information categories listed in the California Customer Records Statute (Cal. Civ. Code §1798.80€)	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	Yes	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service Providers</li> <li>• Professional consultants</li> <li>• For legal, security and safety purposes</li> <li>• Judicial and quasi-judicial bodies</li> <li>• Regulatory and government entities</li> </ul>



Personal Information Collected		Disclosed for business purposes	
Category	Description	Yes / No	Categories of Third Parties
	number, debit card number, or any other financial information, medical information, or health insurance information.		
Protected Classification Characteristics under California or Federal law	Age, ethnicity, citizenship, religion or creed, marital status, physical illness, mental illness or disabilities, gender, veteran status	Yes	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service Providers</li> <li>• Professional consultants</li> <li>• For legal, security and safety purposes</li> <li>• Judicial and quasi-judicial bodies</li> <li>• Regulatory and government entities</li> <li>•</li> </ul>
Customer records	Includes personal information, such as name, account name, billing and payment information, signatures, government identifiers and other information that individuals provide us in order to use our Services	Yes	<ul style="list-style-type: none"> <li>• Affiliates and subsidiaries</li> <li>• Service providers</li> <li>• Professional consultants</li> <li>• For legal, security and safety purposes</li> <li>• Judicial and quasi-judicial bodies</li> <li>• Regulatory and government entities</li> </ul>
Commercial information	Such as records of purchases and use of the Services and other products and services	Yes	Service providers Judicial and quasi-judicial bodies Regulatory and government entities Affiliates
Internet and other Electronic Usage data	Internet or other electronic network activity information, including browsing history, search history, access logs and usage data, and other information regarding a person's interaction with our Sites, Apps and Services	Yes	Service providers Judicial and quasi-judicial bodies Regulatory and government entities Affiliates
Geolocation data	Such as location information from your device or IP address	Yes	Service providers Judicial and quasi-judicial bodies Regulatory and government entities Affiliates
Audio, Video and Electronic Data	Includes audio, electronic, visual, thermal, olfactory, or similar information, such as thermal screenings and CCTV footage (e.g.,	Yes	Service providers Judicial and quasi-judicial bodies Regulatory and government entities Affiliates



Personal Information Collected		Disclosed for business purposes	
Category	Description	Yes / No	Categories of Third Parties
	collected from visitors to our offices for health and safety purposes), photographs and images (e.g., that you provide us) and records of calls, webinars and video conferences (e.g., when you participate in one of our webinars)		
Professional information	Includes professional and employment related information such as your employer’s name, title, the nature of your responsibilities and your practice area, specialties, qualifications, and areas of focus	Yes	Service providers Judicial and quasi-judicial bodies Regulatory and government entities Affiliates
Education information	Information that is not publicly available personally identifiable information as defined in the Federal Education Rights and Privacy Act	Yes	Service providers Judicial and quasi-judicial bodies Regulatory and government entities Affiliates
Inferences	Includes inferences drawn from any of the information identified above to create a profile about you, such as reflecting your preferences and other characteristics	Yes	Service providers Affiliates

In addition to the above, we may disclose the personal information that we collect to others, as necessary to comply with applicable laws or our legal and ethical obligations. We do not knowingly share personal information, including the sensitive personal information, of minors under 16 years of age within the scope of the U.S. Privacy Laws.

### Updates to this Privacy Notice

We may change and update this Privacy Notice from time to time. Any updated Privacy Notice will be effective when posted. If we decide to change and update our Privacy Notice, we will post the updated Privacy Notice on our website and update the “Last updated and effective date.” Please check back regularly to review any changes to this Privacy Notice.

### Contact Aras

You may submit a request to exercise your rights described above by contacting Aras at [privacy@aras.com](mailto:privacy@aras.com).

When you submit a request to Aras, we will take steps to verify your request by matching the information provided by you with the information we have in our records. You must provide your name and contact



information to verify your request. In some cases, we may request additional information in order to verify your request or where necessary to process your request. If we are unable to adequately verify a request, we will notify the requestor. Authorized agents may initiate a request on behalf of another individual by contacting us by email at the above link; authorized agents will be required to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.