

CALIFORNIA PRIVACY NOTICE

Last Updated: 1.28.25

Introduction

This California Privacy Notice supplements our [Privacy Policy](#), and applies to our processing of personal data (sometimes referred to as personal information under certain laws) and the rights you have as a California consumer (individually you or your) under the California Consumer Privacy Act of 2018, as amended by the California Rights Act of 2020, and its implementing regulations (collectively, the CCPA). If you are a California consumer, this California Privacy Notice is designed to help you understand the categories of personal data we collect about you, where we get that personal data, why we process it, who we may share it with, and the rights you have regarding your personal data. Please note, however, that if your information is collected in the context of a business relationship with us, it may not be covered by the CCPA.

This California Privacy Notice uses certain terms that have the meaning given to them by the CCPA, where applicable. Any capitalized terms not defined in this California Privacy Notice or the CCPA shall have the meaning given to them in our [Privacy Policy](#). In the event of a conflict between this California Privacy Notice and our [Privacy Policy](#), the terms of this California Privacy Notice shall control.

CCPA Notice at Collection

We collect and process personal information as described in the Information We Collect section of our [Privacy Policy](#). The relevant CCPA categories for this information are listed below. We may provide a separate notice at collection if we collect additional information or intend to use information for additional purposes.

Category	CCPA Categories of Personal Information
Log Data	<ul style="list-style-type: none">● Identifiers● Internet or Other Electronic Network Activity Information
Device Data	<ul style="list-style-type: none">● Identifiers● Internet or Other Electronic Network Activity Information● Geolocation Data
Personal Information	<ul style="list-style-type: none">● Identifiers● Commercial Information

Data Practices During the Last 12 Months

The disclosures below describe our data practices during the last 12 months.

Collection of Personal Information

Categories of Personal Information Collected

We may collect (and have collected during the preceding 12-month period prior to the Last Updated date of this California Privacy Notice) the categories of personal information listed below. Please note, however, that not all categories have/will be collected or received for every individual.

- Identifiers
- Commercial Information
- Internet or Other Electronic Network Activity Information
- Geolocation Data

We may collect other information that meets the definition of personal information under the CCPA, but which is not reflected by a category above. Under such circumstances, we treat the information as personal information as required by the CCPA, but will not include it when we describe our practices in this California Privacy Notice.

As permitted by the CCPA, we do not treat de-identified data or anonymized information as personal information. We reserve the right to convert (or permit others to convert) personal information to de-identified or anonymous form and may elect not to treat publicly available information as personal information. We will not attempt to re-identify data that we maintain as de-identified data.

Sources of Collected Personal Information

We may collect, receive, or combine personal information from different sources, as described in the Information We Collect section of our [Privacy Policy](#), and as provided below:

- Provided directly by you or a member of your household.
- Collected from a device associated with you or your household.
- Collected from companies that provide services on our behalf.
- Collected from other external third-party sources.

Business and Commercial Purposes for Collection

We may use your personal information for the purposes described in the Information We Collect section of our [Privacy Policy](#), and as provided below:

- Performing services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services.
- To conduct auditing and monitoring of transactions and engagement, including auditing related to counting ad impressions unique to visitors, verifying positioning and quality of ad impressions, and auditing compliance.
- Short-term, transient use, such as non-personalized advertising shown as part of your current interaction with the Site.
- Helping to ensure security and integrity, and to prevent fraud.
- Undertaking activities to verify or maintain the quality or safety of our Software, and to improve, upgrade, or enhance same.
- Debugging to identify and repair errors.
- To conduct business analysis activities, including analytics, projections, and identifying areas for operational improvement.
- To conduct research and development, including undertaking internal research for technological development and demonstration.
- To provide advertising and marketing services, including targeted advertisements.
- To fulfill our legal functions or obligations.

Sale/Sharing of Personal Information

As described in our [Privacy Policy](#), we do not sell personal data. We may, however, share limited information to help ensure you receive useful and relevant advertisements and to measure their effectiveness. We may share personal information with third parties for various purposes, including cross-context behavioral advertising. These kinds of disclosures for cross-context behavioral advertising purposes may be deemed “sharing” personal information as that term is used in the CCPA, and you have the right to opt-out of these disclosures.

We will not, however, share any sensitive personal information for cross-context behavioral advertising purposes (and have not shared any sensitive personal information for such purposes during the preceding 12-month period prior to the Last Updated date of this California Privacy Notice).

Nor will we “sell” your personal information or sensitive personal information as that term is used in the CCPA (and have not sold any personal information or sensitive personal information during the preceding 12-month period prior to the Last Updated date of this California Privacy Notice).

Categories of Personal Information Shared

We may share for cross-context behavioral advertising purposes (and may have shared during the preceding 12-month period prior to the Last Updated date of this California Privacy Notice) the following categories of personal information:

- Identifiers
- Commercial Information
- Internet or Other Electronic Network Activity Information
- Geolocation Data

Purposes for Which Personal Information is Shared

We may share your personal information for cross-context behavioral advertising purposes as described in our [Privacy Policy](#), and for the following business purposes:

- Performing services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services.
- To conduct auditing and monitoring of transactions and engagement, including auditing related to counting ad impressions unique to visitors, verifying positioning and quality of ad impressions, and auditing compliance.
- Short-term, transient use, such as non-personalized advertising shown as part of your current interaction with the Site.
- To conduct business analysis activities, including analytics, projections, and identifying areas for operational improvement.
- To conduct research and development, including undertaking internal research for technological development and demonstration.
- To provide advertising and marketing services, including targeted advertises.

Categories of Third Parties to Whom Personal Information is Shared

We may share your personal information for cross-context behavioral advertising purposes (and may have shared during the preceding 12-month period prior to the *Last Updated date* of this California Privacy Notice) with the following categories of third parties:

- Advertising Networks
- Data Analytics Providers
- Operating Systems and Platforms
- Social Networks

Consumers Under 16 Years of Age

We do not knowingly sell or share for cross-context behavioral advertising purposes the personal information or sensitive personal information of consumers under 16 years of age. For more information about our treatment of children's personal information, please see the Children's Online Privacy Protection Act Compliance section of our [Privacy Policy](#).

Disclosures of Personal Information for Business Purposes

Categories of Personal Information Disclosed for Business Purposes

During the preceding 12-month period prior to the Last Updated date of this California Privacy Notice, we disclosed the below categories of personal information for a business purpose as that term is used in the CCPA:

- Identifiers
- Commercial Information
- Internet or Other Electronic Network Activity Information
- Geolocation Data

Purposes for Which Personal Information is Disclosed

We may disclose your personal information for the purposes described in the Information We Collect section of our [Privacy Policy](#), and as provided below:

- Performing services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services.
- To conduct auditing and monitoring of transactions and engagement, including auditing related to counting ad impressions unique to visitors, verifying positioning and quality of ad impressions, and auditing compliance.
- Short-term, transient use, such as non-personalized advertising shown as part of your current interaction with the Site.
- Helping to ensure security and integrity, and to prevent fraud.
- Undertaking activities to verify or maintain the quality or safety of our Services, and to improve, upgrade, or enhance same.
- Debugging to identify and repair errors.
- To conduct business analysis activities, including analytics, projections, and identifying areas for operational improvement.

- To conduct research and development, including undertaking internal research for technological development and demonstration.
- To fulfill our legal functions or obligations.

Categories of Third Parties to Whom Personal Information is Disclosed

We may disclose your personal information with the categories of third-party recipients described in the Disclosure of Personal Information to Third Parties section of our [Privacy Policy](#).

Use and Disclosure of Sensitive Personal Information

We do not use or disclose sensitive personal information as that term is used in the CCPA.

Retention of Personal Information

Information regarding our data retention practices is described in the How Long We Keep Your Personal Information section of our [Privacy Policy](#).

Your California Privacy Rights

If you are a California resident, you have certain rights relating to your personal information, which are outlined below. Please note that none of these rights are absolute, and are subject to various limitations and exemptions.

Right to Know Categories of Personal Information. The right to know, up to two times per year, what personal information has been collected about you, including: (1) the categories of personal information collected; (2) the categories of sources from which the personal information was collected; (3) the business or commercial purpose for collecting or sharing personal information; and (4) the categories of third parties to whom personal information was disclosed.

Right to Know Specific Pieces of Personal Information. The right to know, up to two times per year, the specific pieces of personal information collected about you.

Right to Delete. The right to request that we delete your personal information, subject to certain exceptions.

Right to Correct. The right to correct inaccurate personal information maintained about you.

Right to Opt-Out. The right to opt-out of the sharing of your personal information for cross-context behavioral advertising purposes.

Non-Discrimination. The right not to receive discriminatory treatment, or be retaliated against, for the exercise of privacy rights conferred by the CCPA.

How to Exercise Your California Privacy Rights

Submissions

If you are a California consumer, you may request to exercise your California privacy rights by contacting us using the information provided in the Contact Us section of this California Privacy Notice. If a request is submitted in an incorrect manner or if it is deficient, we will either: (1) treat the request as if it had been submitted via the designated manner; or (2) provide you with specific directions on how to submit the request or remedy any deficiencies, as applicable.

Verification Processes Generally

If you submit a request to know, delete, or correct, we must verify your identity—typically through your submission of sufficient information for us to reasonably verify you are the consumer about whom we have collected personal information—before we can fulfill your request. We do not verify requests to opt-out of the sharing of your personal information unless we suspect fraud. You are not required to create a password-protected account with us to submit or verify a consumer request.

To verify your identity, we generally require the matching of sufficient information you provide to us with your request to the information we maintain about you in our systems. This may involve sending you a link to verify your email address, and/or requesting additional information or documentation solely for the purpose of verifying your identity. Third-party services may assist us with verification to prevent the disclosure of your personal information resulting from fraudulent requests. Although we endeavor to limit the personal information collected in connection with requests to exercise your rights to know, delete, and correct, certain requests may require us to obtain personal information from you. We will review the information provided, and may request additional information from you to ensure we are interacting with the correct individual.

In certain circumstances, we may decline a request to know, delete, or correct, particularly where we are unable to verify your identity. If we are unable to comply with your request in whole or in part, we will notify you with the reasons for the denial.

Verification Processes Specific to Requests to Know, Delete & Correct

Right to Know Categories of Personal Information. We verify requests to know categories of personal information to a reasonable degree of certainty, which may include matching at least two data points provided by you with data points maintained by us, which we have determined to be reliable for purposes of verification. If we cannot verify you sufficiently to honor a right to know categories request, we will refer you to this California Privacy Notice for a general description of our data practices.

Right to Know Specific Pieces of Personal Information. We verify requests to know specific pieces of personal information to a reasonably high degree of certainty, which may include matching at least three data points provided by you with data points maintained by us, which we have determined to be reliable for purposes of verification. If we cannot verify you sufficiently to honor a right to know specific pieces request, we will treat your request as a right to know categories request.

Right to Delete. We may verify requests to delete to a reasonable degree of certainty, which may include matching at least two data points provided by you with data points maintained by us, or to a reasonably high degree of certainty, which may include matching at least three data points provided by you with data points maintained by us, depending on the sensitivity of the personal information and the risk of harm to the consumer posed by unauthorized deletion. If we cannot verify you sufficiently to honor a deletion request, you are still permitted to submit a request to opt-out of the sharing of your personal information.

Right to Correct. We may verify requests to correct to a reasonable degree of certainty, which may include matching at least two data points provided by you with data points maintained by us, or to a reasonably high degree of certainty, which may include matching at least three data points provided by you with data points maintained by us, depending on the sensitivity of the personal information and the risk of harm to the consumer posed by unauthorized correction.

Requests to Opt-Out of Sharing for Cross-Context Behavioral Advertising

As a California resident, you have the right to direct us to stop sharing your personal information with third parties for purposes of cross-context behavioral advertising and to refrain from doing so in the future. Cross-context behavioral advertising allows you to receive tailored advertisements based on personal information gathered from activity over time and across non-affiliated properties. Opting out does not, however, mean that you will no longer see advertisements from us, or that your experience when using the Site will not be personalized based on your activity on the Site. Rather, the advertisements you see will no longer be tailored to you based on the combination of your activity on the Site and your activity on non-affiliated websites, applications, and online services.

You may submit a request to opt-out of the sharing of your personal information by contacting us using the information provided in the Contact Us section of this California Privacy Notice, or by clicking the “Do Not Sell or Share My Personal Info” link at the bottom of the Site and selecting your preferences.

You may also exercise your right to opt-out of sharing by setting a browser-level opt-out, the Global Privacy Control (GPC) (referred to as an opt-out preference signal in the CCPA). Your request to opt-out of selling or sharing will be linked to your browser identifier only and not linked to any account information because the connection between your browser and the account is not known to us. Because the signal is browser-specific, you will need to broadcast subsequent signals if you are accessing our website through different devices (e.g., computers, smartphones, tablets). For more information on how to set a preference signal to opt-out of cross-context behavioral advertising, please visit the [Global Privacy Control](#) website.

Authorized Agents

You may use an authorized agent to submit a request to know, delete, or correct on your behalf. Authorized agents may submit a request on your behalf by contacting us using the information provided in the Contact Us section of this California Privacy Notice.

Please note that an authorized agent must have your signed permission to submit a request on your behalf, or provide proof that they have power of attorney pursuant to California probate law. When submitting requests on behalf of a consumer, authorized agents must include with their submission an executed written authorization indicating that the agent has been authorized to submit the request on behalf of the consumer. Authorized agents that are business entities must be registered with the California Secretary of State to conduct business in California. Before fulfilling a request from an authorized agent, we may contact you directly to confirm that you have given your permission and/or to verify your identity.

Notice of Right to Opt-Out of Sale/Sharing

As a California resident, you have the right to direct us to stop selling or sharing your personal information to third parties and to refrain from doing so in the future. You may submit a request to opt-out of the selling or sharing of your personal information in the manner described above or by broadcasting an Opt-Out Preference Signal, such as the GPC, on browsers and/or browser extensions that support such a signal.

California Shine the Light

Under California Civil Code § 1798.83 (California Shine the Light Law), California residents who provide personal information in obtaining products or services for personal, family, or household use may be entitled to request and obtain from us, once per calendar year, information about the personal information we have shared, if any, with other businesses for direct marketing uses. At present, we do not share your personal information with third parties for those third parties' direct marketing purposes. Please note that not all information sharing is covered by California's Shine the Light requirements, and only information on covered sharing, if any, will be included in our response.

California Online Privacy Protection Act

As part of the California Online Privacy Protection Act (CalOPPA), all users of the Site Software may make any changes to their information at any time by contacting us at info@pompprogram.com.

Contact Us

For more information, or if you have any questions about this California Privacy Notice, you may contact us using the information below:

Mail: Pompa Program
Attn: Privacy
233 W 12800 S Suite 101
Draper, UT 84020

Email: info@pompprogram.com