

Illume Privacy Notice for California Residents

Last Updated December 8, 2024

This Privacy Notice for California Residents (“Notice”) supplements the information contained in Illume’s privacy statement solely to all visitors, users and others who reside in the State of California (“consumers” or “you”) that access this website or mobile application (collectively, “Websites”) and the services provided through our Websites (collectively, “Services”). We adopt this Notice to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2022 (“CCPA”), and any terms defined in the CCPA have the same meaning when used in this Notice.

When we conduct a Illume survey or assessment for our clients, we act as a “service provider” under the CCPA, which means that our collection and processing of personal information from California residents is on behalf of our clients. You should contact the applicable client to determine whether they are a “business” under the CCPA. If they are a business, you should direct any CCPA requests to them.

In the interest of transparency, the below CCPA disclosures include instances where Illume acts as a “service provider” on behalf of our clients in addition to instances where Illume acts as a “business” and collects personal information on its own behalf.

INFORMATION WE COLLECT

In particular, we collect and, in the 12 months prior to the Last Updated Date of this Notice, have collected the following categories of personal information from consumers:

- Identifiers (name, alias, postal address, online identifier, Internet Protocol address, email address, account name)
- Unique personal identifiers (device identifier; cookies, beacons, pixel tags, mobile ad identifiers, or other similar technology; customer number, unique pseudonym, or user alias; telephone numbers, or other forms of persistent or probabilistic identifiers that can be used to identify a particular consumer or device)
- Personal information described in California’s Customer Records statute (California Civil Code § 1798.80(e)) (telephone number, education, employment, employment history,)
- Characteristics of protected classifications under California or federal law (race, color, sex/gender sexual orientation, gender identity/expression, age (40 and older), religion), marital status, political affiliations or activities)
- Commercial information (records of personal property, products or services purchased, obtained, or considered)

- Internet or other electronic network activity information (browsing history; search history; and information regarding consumer's interaction with website, application, or advertisement)
- Geolocation data
- Professional or employment-related information (including employment history)
- Education information
- Inferences drawn from above information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

We will retain your personal information for as long as necessary to fulfill the purposes for which we collect it, as set out in this Notice, and for the purpose of satisfying any legal, accounting, or reporting requirements that apply to us.

Illume obtains 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 via data analytics providers and advertising networks. For example, from observing your actions on our Website.
- Indirectly from your employer. For example, information required for you to complete a Illume survey or assessment.

We may collect the personal information described above for one or more of the following business or commercial purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products or Services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or Service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- To provide, support, personalize and develop our Websites, products 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 experience on our Websites.
- For testing, research, analysis and product development, including to develop and improve our Websites, 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.

YOUR RIGHTS AND CHOICES

The CCPA provides 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/ACCESS

You have the right to request that Illume disclose certain information to you about our collection and use of your personal information. Once we receive and confirm your verifiable consumer request (see “Exercising Your Right to Know/Access, Deletion, and/or Correction”), 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, selling or sharing that personal information.
- The categories of personal information that we sold, shared, or disclosed (if applicable) and, for each category, the categories of third parties with whom we sold, shared, or disclosed that particular category of personal information (if applicable).
- The specific pieces of personal information we collected about you (also called a data portability request).

RIGHT TO DELETION

You have the right to request that Illume 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 (see “Exercising Your Right to Know/Access, Deletion, and/or Correction”), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

RIGHT TO CORRECTION

You have the right to request that Illume correct inaccurate personal information that we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information. Once we receive and confirm your verifiable consumer request (see “Exercising Your Right to Know/Access, Deletion, and/or Correction”), we will use commercially reasonable efforts to correct the inaccurate personal information.

EXERCISING YOUR RIGHT TO KNOW/ACCESS, DELETION, AND/OR CORRECTION

To exercise the CCPA rights described above, please submit a verifiable consumer request to us by contacting us at:

- privacy@illume-research.com
- (502) 939-9637

Only you, or a person whom you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. If you are submitting a request on behalf of a California resident, please submit the request through one of the designated methods discussed above. After submitting the request, we will require additional information to verify your authority to act on behalf of the California resident.

The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized agent.
- 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.

VERIFICATION OF IDENTITY

We will verify your identity either to a “reasonable degree of certainty” or a “reasonably high degree of certainty” depending on the sensitivity of the personal information and the risk of harm to you by unauthorized disclosure, deletion, or correction as applicable. To do so, we will ask you to verify data points based on information we have in our records concerning you.

RIGHT TO OPT OUT OF SALE OR SHARING OF PERSONAL INFORMATION

If you are a California resident, you have the right to direct us not to sell or share your personal information at any time (the “right to opt out”).

To exercise the right to opt out, you (or your authorized agent) may submit a request to us by contacting us at

NOTICE OF FINANCIAL INCENTIVE

From time to time, you may have the opportunity to provide personal information in exchange for discounts, compensation, and/or price differences. For example, we provide monetary compensation in exchange for you completing certain Illume surveys. Categories of personal information that we may collect when you sign up to receive monetary compensation include your name and email address. For more information, please see the relevant terms associated with these paid surveys.

How to Opt In and Right to Withdraw

Signing up for a financial incentive is optional. By providing your name and email address during the financial incentive sign-up process, you affirmatively opt in to receiving the financial incentive and to participate in a survey. You have the right to withdraw from the financial incentive at any time. If you opt out of receiving a financial incentive, we will not reduce the value of any financial incentives you previously received from us. If you wish to withdraw from receiving the financial incentive, you may submit such a request at any time by emailing us at privacy@illume-research.com.

How the Financial Incentive is Reasonably Related to the Value of Your Personal Information

The financial incentive or price difference is reasonably related to the value provided by your personal information. We take into consideration, without limitation, the anticipated revenue generated from such information, the anticipated expenses which we might incur in the collection, storage, and use of such information, and the anticipated expenses which we might incur related to the offer, provision, and imposition of any financial incentive or price difference. Based on this analysis, the value of your personal information that allows us to make these offers and financial incentives is the value of the offer itself.

ADDITIONAL QUESTIONS OR COMMENTS

- If you have any inquiries, complaints, access requests and any other questions or comments regarding this Notice, please [contact us](#).