

## OJ Electronics Privacy Notice for Colorado Residents

This Privacy Notice for Colorado Residents supplements the information contained in OJ Electronics’s Privacy Statement (the “Privacy Policy”) and applies solely to customers, business partners, and others who share their Personal Data with us who reside in the State of Colorado (“Colorado Consumers” or “you”). Capitalized terms used and not defined in this Privacy Notice for Colorado Residents will have the definition in the Privacy Policy. We adopt this notice to comply with the Colorado Consumer Privacy Act of 2023 (“CPA”) and, unless defined in this Privacy Notice for Colorado Residents or the Privacy Policy, any terms defined in the CPA have the same meaning when used in this Privacy Notice for Colorado Residents.

### INFORMATION WE COLLECT

We collect Personal Data as defined in the Privacy Policy from Colorado Consumers. In particular, OJ Electronics has collected data within the following categories of Personal Data from its Colorado Consumers within the last twelve (12) months through its Online Interfaces and through other means:

Category	Examples	Collected
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the Colorado Customer Records statute (Colo.. Rev. Stat. § 6-1-1301 et seq.)	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 number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Data included in this category may overlap with other categories.	NO
C. Protected classification characteristics under Colorado or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information), Biometric data, or Citizenship status.	NO
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, face prints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO

F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data	Physical location or movements.	NO
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

*The examples provided above come from the CCPA/CPRA/VCDPA/CPA and other statutes, as noted. They are reproduced here for your convenience to help you understand the types of information that are considered within each category. It is not meant to imply that we collect all such information listed in the examples. We only collect the specific pieces of Personal Data described in our Privacy Policy.*

Personal information does not include:

- Publicly available information from government records
- De-identified or aggregated consumer information
- Information excluded from the CPRA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Colorado Confidentiality of Medical Information Act (CMIA) or clinical trial data
  - Personal Data covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or Colorado Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994 (DDPA).

OJ Electronics obtains the categories of Personal Data listed above from the categories of sources listed in the Privacy Policy:

## **USE OF PERSONAL DATA**

We may use or disclose the Personal Data we collect for the business or commercial purposes described in our Privacy Policy. OJ Electronics will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## **SHARING PERSONAL INFORMATION**

### Disclosures of Personal Information for a Business Purpose

OJ Electronics may disclose your Personal Data to a third party for a business purpose. When we disclose Personal Data for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Data confidential and not use it for any purpose except performing the contract. The CPA prohibits third parties who purchase the Personal Data we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

We share your Personal Data with the third-parties described in our Privacy Policy under “How We Share Your Personal Data”. In the preceding twelve (12) months, OJ Electronics has disclosed the following categories of Personal Data for a business purpose:

Category A: Identifiers.

Category B: Colorado Customer Records Personal Data categories.

Category C: Protected classification characteristics under Colorado or federal law.

Category D: Commercial information.

Category E: Internet or other similar network activity.

We disclose your Personal Data for a business purpose to the following categories of third parties:

- Service providers
  - Other OJ ELECTRONICS entities, brands, divisions, and subsidiaries
- and
- All other third-parties described in our Privacy Policy under “How We Share Your Personal Data.”

### Sales of Personal Information

We do not sell your Personal Data (as the term “sale” is defined in the CPA).

## **YOUR RIGHTS AND CHOICES**

The CPA provides consumers (Colorado residents) with specific rights regarding their Personal Data. This section describes your CPA rights and explains how to exercise those rights.

### Access to Specific Information and Data Portability Rights

You have the right to request that OJ Electronics disclose certain information to you about our collection and use of your Personal Data over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of Personal Data we collected about you.
- The categories of sources for the Personal Data we collected about you.
- Our business or commercial purpose for collecting or selling that Personal Data (if applicable).
- The categories of third parties with whom we share that Personal Data.
- The specific pieces of Personal Data we collected about you (also called a data portability request).
- If we sold or disclosed your Personal Data for a business purpose, two separate lists disclosing:
  - sales, identifying the Personal Data categories that each category of recipient purchased;
  - and
  - disclosures for a business purpose, identifying the Personal Data categories that each category of recipient obtained.

### Deletion and Correction Request Rights

You have the right to request that OJ Electronics delete or correct any of your Personal Data that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, Correction and Deletion Rights), we will delete (and direct our service providers to delete) your Personal Data from our records, unless an exception applies.

We may deny your request for Deletion or Correcting if retaining the information is necessary for us or our service provider(s) to:

- a) Complete the transaction for which we collected the Personal Data, 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
- b) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities
- c) Debug products to identify and repair errors that impair existing intended functionality
- d) Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law
- e) Comply with the Electronic Communications Privacy Act of 1986 (18 U.S.C. §§ 2510-2523et. seq.).
- f) Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent
- g) Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us
- h) Comply with a legal obligation
- i) Make other internal and lawful uses of that information that are compatible with the context in which you provided it

#### Exercising Access, Data Portability, Correction and Deletion Rights

To exercise the access, data portability, correction and deletion rights described above, please submit a verifiable consumer request to us by one of the following means:

OJ Electronics  
PO Box 366  
Arlington height, IL 60006 USA  
Fax: +1 847-870-1907  
Email: [privacy@ojelectronics.com](mailto:privacy@ojelectronics.com)

Only you, or a person registered with the Colorado Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Data. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Data 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 Data if we cannot verify your identity or authority to make the request and confirm the Personal Data relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to Personal Data associated with that specific account.

We will only use Personal Data provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

#### Response Timing and Format

We endeavour to respond to a verifiable consumer request within fortyfive (45) days of its receipt. If we require more time (up to 45 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 Data 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**

We will not discriminate against you for exercising any of your CPA rights. Unless permitted by the CPRA, we will not:

- Deny you goods or services
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties
- Provide you a different level or quality of goods or services
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services

However, we may offer you certain financial incentives permitted by the CPRA that can result in different prices, rates, or quality levels. Any CPRA-permitted financial incentive we offer will reasonably relate to your Personal Data's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

#### "Shine the Light"

Under Colorado's law, you are entitled to ask us for a notice identifying the categories of Personal Data which we share with our affiliates and/or third parties for marketing purposes and providing contact information for such affiliates and/or third parties. If you would like a copy of this notice, please submit a written request to [privacy@ojelectronics.com](mailto:privacy@ojelectronics.com)

## **CHILDREN's PRIVACY**

Our service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

## **CHANGES TO OUR PRIVACY NOTICE**

OJ ELECTRONICS reserves the right to amend this Privacy Notice for Colorado Residents as described in our Privacy Policy. When we make changes to this Privacy Notice for Colorado Residents, we will inform you of such updates, and such updates will become effective, as described in our Privacy Policy.

## **CONTACT INFORMATION**

If you have any questions or comments about this Privacy Notice for Colorado Residents, the ways in which OJ Electronics collects and uses your information described in this Privacy Notice for Colorado Residents or in the Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under Colorado law, please do not hesitate to contact us as described in our Privacy Policy.

Effective Date: January 2023